UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT

At a stated term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 9th day of August, two thousand nineteen.

Julie Brown, Miami Herald Media Company,

Intervenors - Appellants.

v.

Ghislaine Maxwell,

Defendant - Appellee,

v.

Virginia L. Giuffre,

Plaintiff - Appellee.

ORDER

Docket No: 18-2868

Appellee, Ghislaine Maxwell, filed a petition for panel rehearing, or, in the alternative, for rehearing *en banc*. The panel that determined the appeal has considered the request for panel rehearing, and the active members of the Court have considered the request for rehearing *en banc*.

IT IS HEREBY ORDERED that the petition is denied.

FOR THE COURT:
Catherine O'Hagan Wolfe, Clerk



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UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 9th day of August, two thousand nineteen.

Before: José A. Cabranes,
Rosemary S. Pooler,
Christopher F. Droney,
Circuit Judges.

Julie Brown, Miami Herald Media Company,

Intervenors - Appellants,

v.

Ghislaine Maxwell,

Defendant - Appellee,

v.

Virginia L. Giuffre,

Plaintiff - Appellee.

ORDER

18-2868

Alan M. Dershowitz, Michael Cernovich,
DBA Cernovich Media,

Intervenors - Appellants,

v.

Virginia L. Giuffre,

Plaintiff - Appellee,

v.

Ghislaine Maxwell,

Defendant-Appellee.

16-3945(L)
17-1625(Con)
17-1722(Con)

IT IS HEREBY ORDERED that the Clerk is directed to issue the mandate forthwith.

For the Court**:**

Catherine O'Hagan Wolfe,
Clerk of Court

UNITED STATES SECOND CIRCUIT COURT OF APPEALS

Catherine O'Hagan Wolfe

UNITED STATES COURT OF APPEALS
FOR THE
SECOND CIRCUIT

At a Stated Term of the United States Court of Appeals for the Second Circuit, held at the Thurgood Marshall United States Courthouse, 40 Foley Square, in the City of New York, on the 3rd day of July, two thousand and nineteen.

Before: José A. Cabranes,
Rosemary S. Pooler,
Christopher F. Droney,
Circuit Judges.

Julie Brown, Miami Herald Media Company,

Intervenors - Appellants.

v.

Ghislaine Maxwell,

Defendant - Appellee,

v.

Virginia L. Giuffre,

Plaintiff - Appellee.

JUDGMENT
Docket Nos. 18-2868

The appeal in the above captioned case from a judgment of the United States District Court for the Southern District of New York was argued on the district court's record and the parties' briefs. Upon consideration thereof,

IT IS HEREBY ORDERED, ADJUDGED and DECREED that the orders of the District Court entered on November 2, 2016, May 3, 2017, and August 27, 2018 are VACATED. The Court further ORDERS the unsealing of the summary judgment record as described in its opinion. The case is REMANDED to the District Court for a particularized review of the remaining materials.

For the Court**:**

Catherine O'Hagan Wolfe,
Clerk of Court

In the
United States Court of Appeals
for the Second Circuit

AUGUST TERM 2018

No. 18-2868-cv

JULIE BROWN, MIAMI HERALD COMPANY,
Intervenors-Appellants,

v.

GHISLAINE MAXWELL,
Defendant-Appellee,

v.

VIRGINIA L. GIUFFRE,
Plaintiff-Appellee.

No. 16-3945-cv(L)
No. 17-1625 (CON)
No. 17-1722(CON)

ALAN M. DERSHOWITZ, MICHAEL CERNOVICH, DBA CERNOVICH MEDIA,
Intervenors-Appellants,

v.

VIRGINIA L. GIUFFRE,
Plaintiff-Appellee,

v.

GHISLAINE MAXWELL,
Defendant-Appellee.[*]

On Appeal from the United States District Court
for the Southern District of New York

ARGUED: MARCH 6, 2019
DECIDED: JULY 3, 2019

Before: CABRANES, POOLER, and DRONEY, *Circuit Judges*.

Intervenors-Appellants Alan Dershowitz, Michael Cernovich, and the Miami Herald Company (with reporter Julie Brown) appeal from certain orders of the United States District Court for the Southern District of New York (Robert W. Sweet, *Judge*) denying their respective motions to unseal filings in a defamation suit. We conclude that the

[*] The Clerk of Court is directed to amend the captions as set out above.

District Court failed to conduct the requisite particularized review when ordering the sealing of the materials at issue. At the same time, we recognize the potential damage to privacy and reputation that may accompany public disclosure of hard-fought, sensitive litigation. We therefore clarify the legal tools that district courts should use in safeguarding the integrity of their dockets. Accordingly, we **VACATE** the District Court's orders entered on November 2, 2016, May 3, 2017, and August 27, 2018, **ORDER** the unsealing of the summary judgment record as described further herein, and **REMAND** the cause to the District Court for particularized review of the remaining sealed materials.

Judge Pooler concurs in this opinion except insofar as it orders the immediate unsealing of the summary judgment record without a remand.

SANFORD L. BOHRER (Christine N. Walz, Madelaine J. Harrington, New York, NY, *on the brief*), Holland & Knight LLP, Miami, FL, *for Intervenors-Appellants Julie Brown and Miami Herald.*

TY GEE (Adam Mueller, *on the brief*), Haddon, Morgan and Foreman, P.C., Denver, CO, *for Defendant-Appellee Ghislaine Maxwell.*

PAUL G. CASSELL (Sigrid S. McCawley, Boies Schiller Flexner LLP, Ft. Lauderdale, FL, *on the brief*), S.J Quinney College of Law, University of Utah, Salt Lake City, UT, *for Plaintiff-Appellee Virginia L. Giuffre.*

ANDREW G. CELLI JR. (David A. Lebowitz, *on the brief*), Emery, Celli, Brinckerhoff & Abady LLP, New York, NY, *for Intervenor-Appellant Alan M. Dershowitz.*

MARC RANDAZZA (Jay Marshall Wolman, Las Vegas, NV, *on the brief*), Randazza Legal Group, PLLC, Hartford, CT, *for Intervenor-Appellant Michael Cernovich.*

JOSÉ A. CABRANES, *Circuit Judge*:

Intervenors-Appellants Alan M. Dershowitz ("Dershowitz"), Michael Cernovich ("Cernovich"), and the Miami Herald Company (with reporter Julie Brown, jointly the "*Herald*") appeal from certain orders of the United States District Court for the Southern District of New York (Robert W. Sweet, *Judge*) denying their respective motions to unseal filings in a defamation suit. We conclude that the District Court failed to conduct the requisite particularized review when ordering the sealing of the materials at issue. At the same time, we

recognize the potential damage to privacy and reputation that may accompany public disclosure of hard-fought, sensitive litigation. We therefore clarify the legal tools that district courts should use in safeguarding the integrity of their dockets. Accordingly, we **VACATE** the District Court's orders entered on November 2, 2016, May 3, 2017, and August 27, 2018, **ORDER** the unsealing of the summary judgment record as described further herein, and **REMAND** the cause to the District Court for particularized review of the remaining sealed materials.

I. BACKGROUND

A. Jeffrey Epstein's Conviction and the CVRA Suit

The origins of this case lie in a decade-old criminal proceeding against financier Jeffrey Epstein ("Epstein"). On June 30, 2008, Epstein pleaded guilty to Florida state charges of soliciting, and procuring a person under the age of eighteen for, prostitution. The charges stemmed from sexual activity with privately hired "masseuses," some of whom were under eighteen, Florida's age of consent. Pursuant to an agreement with state and federal prosecutors, Epstein pleaded to the state charges. He received limited jail-time, registered as a sex offender, and agreed to pay compensation to his victims. In return, prosecutors declined to bring federal charges.

Shortly after Epstein entered his plea, two of his victims, proceeding as "Jane Doe 1" and "Jane Doe 2," filed suit against the Government in the Southern District of Florida under the Crime Victims' Rights Act ("CVRA"). The victims sought to nullify the plea

agreement, alleging that the Government failed to fulfill its legal obligations to inform and consult with them in the process leading up to Epstein's plea deal.[1]

On December 30, 2014, two additional unnamed victims—one of whom has now self-identified as Plaintiff-Appellee Virginia Giuffre ("Giuffre")—petitioned to join in the CVRA case. These petitioners included in their filings not only descriptions of sexual abuse by Epstein, but also new allegations of sexual abuse by several other prominent individuals, "including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders," as well as Dershowitz (a long-time member of the Harvard Law School faculty who had worked on Epstein's legal defense) and Defendant-Appellee Ghislaine Maxwell ("Maxwell").[2]

Dershowitz moved to intervene, seeking to "strike the outrageous and impertinent allegations made against him and to request a show cause order to the attorneys that have made them."[3] Exercising its authority to "strike from a pleading an insufficient

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[1] On February 21, 2019, the Florida District Court ruled that federal prosecutors had violated the CVRA by failing to adequately notify the two victims-plaintiffs of the plea deal. The District Court has not yet determined the appropriate remedy. *See Doe 1 v. United States*, 359 F. Supp. 3d 1201, 1204–17 (S.D. Fla. 2019).

[2] *Doe 1 v. United States*, No. 08-CV-80736-KAM, 2015 WL 11254692, at *2 (S.D. Fla. Apr. 7, 2015) (internal quotation marks omitted).

[3] *Id.* (internal quotation marks and brackets omitted).

defense or any redundant, immaterial, impertinent, or scandalous matter . . . on its own,"[4] the Florida District Court (Kenneth A. Marra, *Judge*) *sua sponte* struck all allegations against additional parties from the pleadings, including those against Dershowitz, and therefore denied Dershowitz's motion as moot.[5]

The stricken allegations, however, quickly found their way into the press, and several media outlets published articles repeating Giuffre's accusations. In response to the allegations, on January 3, 2015, Maxwell's publicist issued a press statement declaring that Giuffre's allegations "against Ghislaine Maxwell are untrue" and that her "claims are obvious lies."[6]

B. Giuffre Sues Maxwell

On September 21, 2015, Giuffre filed the underlying action against Maxwell in the Southern District of New York. Giuffre alleged that Maxwell had defamed her through this and other public statements. Extensive and hard-fought discovery followed. Due to the volume of sealing requests filed during discovery, on August 9, 2016, the District Court entered a Sealing Order that effectively ceded control of the sealing process to the parties themselves. The Sealing Order disposed of the requirement that the parties file individual letter briefs to request sealing and prospectively granted all of the parties'

[4] Fed. R. Civ. P. 12(f).

[5] *Doe 1*, 2015 WL 11254692, at *2–3.

[6] *See Giuffre v. Maxwell*, 325 F. Supp. 3d 428, 434 (S.D.N.Y. 2018).

future sealing requests. In total, 167 documents—nearly one-fifth of the docket—were filed under seal. These sealed documents include, *inter alia*, motions to compel discovery, motions for sanctions and adverse inferences, motions *in limine*, and similar material.

On January 6, 2017, Maxwell filed a motion for summary judgment. The parties submitted their memoranda of law and supporting exhibits contesting this motion under seal. On March 22, 2017, the District Court denied the motion in a heavily redacted 76-page opinion. Once again, the entire summary judgment record, including the unredacted version of the District Court opinion denying summary judgment, remained under seal. On May 24, 2017, Maxwell and Giuffre executed a settlement agreement, and the case was closed the next day.

C. Motions to Intervene and Unseal

Over the course of the litigation before Judge Sweet, three outside parties attempted to unseal some or all of the sealed material. On August 11, 2016, Dershowitz moved to intervene, seeking to unseal three documents that, he argues, demonstrate that Giuffre invented the accusations against him. On January 19, 2017, Cernovich, an independent blogger and self-described "popular political journalist,"[7] moved to intervene, seeking to unseal the summary judgment record, and Dershowitz joined his motion. On April 6, 2018, after the case had settled, the *Herald* moved to intervene and unseal

[7] Br. Appellant (Cernovich) 4.

the entire docket. The District Court granted each of these motions to intervene, but denied the related requests to unseal in orders entered November 2, 2016, May 3, 2017, and August 27, 2018, respectively.

The Appellants timely appealed from each of the orders denying their respective motions to unseal. Although each Appellant seeks the release of a different set of documents, all argue that the District Court failed to analyze the documents individually or properly apply the presumption of public access to court documents. We therefore ordered that the appeals be heard in tandem and held argument on March 6, 2019.

On March 11, 2019, we issued an order to show cause why we "should not unseal the summary judgment motion, including any materials filed in connection with this motion, and the District Court's summary judgment decision."[8] The parties timely filed their responses.

II. DISCUSSION

There are two categories of sealed material at issue in these appeals: (1) the summary judgment record, which includes the parties' summary judgment briefs, their statements of undisputed facts, and incorporated exhibits; and (2) court filings made in the course of the discovery process and with respect to motions *in limine*. In this Opinion, we explain that our law requires the unsealing of the

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[8] *Giuffre v. Maxwell,* No. 18-2868-cv, Docket No. 138.

summary judgment materials and individualized review of the remaining sealed materials.

While the law governing public access to these materials is largely settled, we have not yet adequately addressed the potential harms that often accompany such access. These harms are apparent. Over forty years ago, the Supreme Court observed that, without vigilance, courts' files might "become a vehicle for improper purposes."[9] Our legal process is already susceptible to abuse. Unscrupulous litigants can weaponize the discovery process to humiliate and embarrass their adversaries. Shielded by the "litigation privilege,"[10] bad actors can defame opponents in court pleadings or depositions without fear of lawsuit and liability. Unfortunately, the presumption of public access to court documents has the potential to exacerbate these harms to privacy and reputation by ensuring that damaging material irrevocably enters the public record.

We therefore take the opportunity to describe the tools available to district courts in protecting the integrity of the judicial process, and emphasize the courts' responsibility to exercise these powerful tools. We also caution the public to critically assess allegations contained in judicial pleadings.

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[9] *Nixon v. Warner Commc'ns, Inc.*, 435 U.S. 589, 598 (1978).

[10] *See* notes 46–47 and accompanying text, *post*.

A. Standard of Review

When reviewing a district court's decision to seal a filing or maintain such a seal, "we examine the court's factual findings for clear error, its legal determinations de novo, and its ultimate decision to seal or unseal for abuse of discretion."[11]

B. The Summary Judgment Materials

With respect to the first category of materials, it is well-settled that "documents submitted to a court for its consideration in a summary judgment motion are—as a matter of law—judicial documents to which a strong presumption of access attaches, under both the common law and the First Amendment."[12] In light of this strong First Amendment presumption, "continued sealing of the documents may be justified only with specific, on-the-record findings that sealing is necessary to preserve higher values and only if the sealing order is narrowly tailored to achieve that aim."[13]

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[11] *Bernstein v. Bernstein Litowitz Berger & Grossmann LLP*, 814 F.3d 132, 139 (2d Cir. 2016).

[12] *Lugosch v. Pyramid Co. of Onondaga*, 435 F.3d 110, 121 (2d Cir. 2006). We observe that our holding in *Lugosch* relies on the general principle that parties may "be assumed to have supported their papers with admissible evidence and non-frivolous arguments." *Id.* at 122. Insofar as a district court has, through striking a filing, specifically found that assumption inapplicable, the categorical rule in *Lugosch* may not apply. *See* notes 42–43 and accompanying text, *post.*

[13] *Id.* at 124. Examples of such countervailing values may include, depending on the circumstances, preserving "the right of an accused to fundamental fairness in the jury selection process," *Press-Enter. Co. v. Superior Court*

In this case, the District Court erred in several respects.[14] First, it failed to give proper weight to the presumption of access that attaches to documents filed in connection with summary judgment motions. The District Court reasoned that the summary judgment materials were "entitled to a lesser presumption of access" because "summary judgment was denied by the Court."[15] In assigning a "lesser presumption" to such materials, the District Court relied on a single sentence of dicta from our decision in *United States v. Amodeo*.[16] We have since clarified, however, that this sentence was based on a "quotation from a partial concurrence and partial dissent in the D.C. Circuit . . . [and] is thus not the considered decision of either this court or the D.C. Circuit."[17] In fact, we have expressly rejected the proposition that "different types of documents might receive different

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of California, Riverside Cty., 464 U.S. 501, 510 (1984); the protection of attorney-client privilege, *Lugosch*, 435 F.3d at 125; "the danger of impairing law enforcement or judicial efficiency," *SEC. v. TheStreet.Com*, 273 F.3d 222, 232 (2d Cir. 2001); and "the privacy interest of those who resist disclosure," *id.*

[14] Our discussion here focuses specifically on the District Court's denial of the *Herald's* motion to unseal the entire record. Because this decision grants relief to all Appellants, we need not discuss any separate, additional error in the District Court's denial of the earlier motions to unseal.

[15] *Giuffre*, 325 F. Supp. 3d at 444.

[16] 71 F.3d 1044, 1049 (2d Cir. 1995) ("*Amodeo II*") ("One judge [in the District of Columbia Circuit] has pointed out, for example, that where a district court *denied* the summary judgment motion, essentially postponing a final determination of substantive legal rights, the public interest in access is not as pressing." (internal quotation marks omitted; emphasis in original)).

[17] *Lugosch*, 435 F.3d at 121.

weights of presumption based on the extent to which they were relied upon in resolving [a] motion [for summary judgment]."[18]

Second, in contravention of our precedent, the District Court failed to review the documents individually and produce "specific, on-the-record findings that sealing is necessary to preserve higher values."[19] Instead, the District Court made generalized statements about the record as a whole.[20] This too was legal error.

Finally, upon reviewing the summary judgment materials in connection with this appeal, we find that there is no countervailing privacy interest sufficient to justify their continued sealing. Remand with respect to these documents is thus unnecessary. Accordingly, and to avoid any further delay,[21] we order that the summary judgment documents (with minimal redactions) be unsealed upon issuance of our mandate.[22]

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[18] *Id.* at 123.

[19] *Id.* at 124.

[20] *See, e.g.*, *Giuffre*, 325 F. Supp. 3d at 445 (summarily concluding that all "[t]he Summary Judgment Judicial Documents openly refer to and discuss these allegations [of sexual assault and sexual trafficking] in comprehensive detail, and that those allegations "establish[] a strong privacy interest here").

[21] *Cf. Lugosch*, 435 F.3d at 127 (ordering that "the mandate shall issue forthwith" to expedite the unsealing process).

[22] Upon issuance of our mandate, a minimally redacted version of the summary judgment record will be made accessible on the Court of Appeals docket. We have implemented minimal redactions to protect personally identifying information such as personal phone numbers, contact lists, birth dates, and social

C. The Remaining Sealed Materials

The law governing disclosure of the remaining sealed material in this case is only slightly more complex. The Supreme Court has recognized a qualified right "to inspect and copy judicial records and documents."[23] In defining "judicial records and documents," we have emphasized that "the mere filing of a paper or document with the court is insufficient to render that paper a judicial document subject to the right of public access."[24] Instead, "the item filed must be relevant to the performance of the judicial function and useful in the judicial process in order for it to be designated a judicial document."[25]

As our precedent makes clear, a court "perform[s] the judicial function" not only when it rules on motions currently before it, but also when properly exercising its inherent "supervisory powers."[26] A

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security numbers. We have also redacted the names of alleged minor victims of sexual abuse from deposition testimony and police reports, as well as deposition responses concerning intimate matters where the questions were likely only permitted—and the responses only compelled—because of a strong expectation of continued confidentiality. *See* Fed. R. Civ. P. 5.2. While we appreciate the views expressed in Judge Pooler's separate opinion, the panel majority believes that the efforts invested by three former district judges in reviewing these materials adequately address those concerns.

[23] *Nixon*, 435 U.S. at 597–98.

[24] *United States v. Amodeo*, 44 F.3d 141, 145 (2d Cir. 1995) ("*Amodeo I*").

[25] *Id.*

[26] *Cf. United States v. HSBC Bank USA, N.A.*, 863 F.3d 125, 135 (2d Cir. 2017) (explaining that, in considering whether the report of a monitor charged with assessing compliance with a deferred prosecution agreement is a judicial

document is thus "relevant to the performance of the judicial function" if it would reasonably have the *tendency* to influence a district court's ruling on a motion or in the exercise of its supervisory powers, without regard to which way the court ultimately rules or whether the document ultimately in fact influences the court's decision.[27] Accordingly, if in applying these standards, a court determines that documents filed by a party are *not* relevant to the performance of a judicial function, no presumption of public access attaches.[28]

Once an item is deemed relevant to the exercise of judicial power, "the weight to be given the presumption of access must be governed by the role of the material at issue in the exercise of Article III judicial power and the resultant value of such information to those

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document, "[i]f the district court's conception of its supervisory power in this context were correct, the Monitor's Report would quite obviously be relevant to the performance of the judicial function and useful in the judicial process" (internal quotation marks omitted)). Whether a specific judicial decision constitutes a "performance of the judicial function" is a question of law. Accordingly, we review such determinations *de novo*. *Id.* at 134.

[27] *Amodeo I*, 44 F.3d at 145–46 (concluding that documents were relevant to the performance of a judicial function because they would have "informed" the district court's decision whether to discharge or retain a Receiver); *see also FTC. v. Standard Fin. Mgmt. Corp.*, 830 F.2d 404, 409 (1st Cir. 1987) (citing Federal Rule of Evidence 401's "having any tendency" definition of relevance in determining whether documents were "judicial documents").

[28] As we explain below, there are several (often preferable) tools beyond sealing that district courts can use to protect their dockets from becoming a vehicle for irrelevant—and potentially defamatory—accusations. *See* Section D, *post.*

monitoring the federal courts."[29] Thus, while evidence introduced at trial or in connection with summary judgment enjoys a strong presumption of public access, documents that "play only a negligible role in the performance of Article III duties" are accorded only a low presumption that "amounts to little more than a prediction of public access absent a countervailing reason."[30] Documents that are never filed with the court, but simply "passed between the parties in discovery, lie entirely beyond the presumption's reach."[31]

The remaining sealed materials at issue here include filings related to, *inter alia*, motions to compel testimony, to quash trial subpoenae, and to exclude certain deposition testimony. All such motions, at least on their face, call upon the court to exercise its Article III powers. Moreover, erroneous judicial decision-making with respect to such evidentiary and discovery matters can cause substantial harm. Such materials are therefore of value "to those monitoring the federal courts."[32] Thus, all documents submitted in connection with, and relevant to, such judicial decision-making are subject to at least some presumption of public access.[33]

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[29] *Amodeo II*, 71 F.3d at 1049.

[30] *Id.* at 1050.

[31] *Id.*

[32] *Id.* at 1049.

[33] In previous decisions, we have identified an important exception to this general rule: the presumption of public access does *not* apply to material that is submitted to the court solely so that the court may decide whether that same

Although a court's authority to oversee discovery and control the evidence introduced at trial surely constitutes an exercise of judicial power, we note that this authority is ancillary to the court's core role in adjudicating a case. Accordingly, the presumption of public access in filings submitted in connection with discovery disputes or motions *in limine* is generally somewhat lower than the presumption applied to material introduced at trial, or in connection with dispositive motions such as motions for dismissal or summary judgment.[34] Thus, while a court must still articulate specific and substantial reasons for sealing such material, the reasons usually need not be as compelling as those required to seal summary judgment filings.

Here, the precise basis for the District Court's decision to deny the motion to unseal these remaining materials is unclear. In the three paragraphs devoted to the issue, the District Court emphasized the potential for embarrassment "given the highly sensitive nature of the underlying allegations," and concluded that "the documents sealed in the course of discovery were neither relied upon by [the District] Court in the rendering of an adjudication, nor necessary to or helpful in resolving a motion."[35] It is therefore unclear whether the District Court held that these materials were not judicial documents (and thus are

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material must be disclosed in the discovery process or shielded by a Protective Order. *See TheStreet.Com*, 273 F.3d at 233.

[34] *Amodeo II*, 71 F.3d at 1049–50.

[35] *Giuffre*, 325 F. Supp. 3d. at 442 (internal quotation marks and brackets omitted).

not subject to a presumption of public access), or found that privacy interests outweighed a limited right of public access.

On either interpretation, however, the District Court's holding was error. Insofar as the District Court held that these materials are not judicial documents because it did not rely on them in adjudicating a motion, this was legal error. As explained above, the proper inquiry is whether the documents are relevant to the performance of the judicial function, not whether they were relied upon.[36] Indeed, decision-makers often find that a great deal of relevant material does not ultimately sway their decision. And insofar as the District Court held that privacy interests outweigh the presumption of public access in each of the thousands of pages at issue, that decision—which appears to have been made without particularized review—amounts to an abuse of discretion.[37]

In light of the District Court's failure to conduct an individualized review of the sealed materials, it is necessary to do so now. We believe the District Court is best situated to conduct this review. The District Court can directly communicate with the parties, and can therefore more swiftly and thoroughly consider particular objections to unsealing specific materials. Relatedly, the District Court can obtain the parties' assistance in effecting any necessary redactions, and in notifying any outside parties whose privacy interests might be

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[36] *See* text accompanying notes 12–18 and 26–28, *ante.*

[37] *See In re City of New York*, 607 F.3d 923, 943 n.21 (2d Cir. 2010) (explaining that "abuse of discretion" is a nonpejorative, legal "term of art").

implicated by the unsealing. Accordingly, we remand the cause to the District Court to conduct such a particularized review and unseal all documents for which the presumption of public access outweighs any countervailing privacy interests.

D. Protecting the Integrity of Judicial Proceedings

While we disagree with the District Court's disposition of the motions to unseal, we share its concern that court files might be used to "promote scandal arising out of unproven potentially libelous statements."[38] We therefore describe certain methods courts can employ to protect the judicial process from being coopted for such purposes.

The Supreme Court has explained that "[e]very court has supervisory power over its own records and files" to ensure they "are not used to gratify private spite or promote public scandal" or "serve as reservoirs of libelous statements for press consumption."[39] This supervisory function is not only within a district court's power, but also among its responsibilities.

In practice, district courts may employ several methods to fulfill this function. They may, for instance, issue protective orders forbidding dissemination of certain material "to protect a party or person from annoyance, embarrassment, oppression, or undue

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[38] *Giuffre*, 325 F. Supp. 3d at 447.

[39] *Nixon*, 435 U.S. at 598 (internal quotation marks).

burden" and require that filings containing such material be submitted under seal.[40] If parties then seek to file such materials, the court may deny them leave to do so.[41] District courts may also seek to counteract the effect of defamatory statements by explaining on the record that the statements appear to lack credibility. Moreover, under Federal Rule of Civil Procedure 12(f), the district court may strike such material from the filings on the grounds that it is "redundant, immaterial, impertinent, or scandalous."[42] Because such rejected or stricken material is not "relevant to the performance of the judicial function" it would not be considered a "judicial document" and would enjoy no presumption of public access.[43] Finally, in appropriate

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[40] Fed. R. Civ. P. 26(c); *see also TheStreet.Com*, 273 F.3d at 229–30.

[41] *See, e.g.*, S.D.N.Y. Electronic Case Filing Rules & Instructions, February 1, 2019 Edition, Rule 6.1, http://nysd.uscourts.gov/ecf/ECF%20Rules%20020119%20Final.pdf.

[42] Fed. R. Civ. P. 12(f). Courts may strike material from the pleadings either "on its own" or "on motion made by a party." *Id.* Although motions to strike material *solely* "on the ground that the matter is impertinent and immaterial" are disfavored, when material is also "scandalous," no such presumption applies. *Cf. Lipsky v. Commonwealth United Corp.*, 551 F.2d 887, 893 (2d Cir. 1976); *see also Talbot v. Robert Matthews Distrib. Co.*, 961 F.2d 654, 664 (7th Cir. 1992) ("Allegations may be stricken as scandalous if the matter bears no possible relation to the controversy or may cause the objecting party prejudice."); *Wine Markets Int'l, Inc. v. Bass*, 177 F.R.D. 128, 133 (E.D.N.Y. 1998) ("Motions to strike are not generally favored, except in relation to scandalous matters."); *Alvarado-Morales v. Digital Equip. Corp.*, 843 F.2d 613, 617–18 (1st Cir. 1988) (categorizing as scandalous "matter which impugned the character of defendants").

[43] *Amodeo I*, 44 F.3d at 145.

circumstances, district courts may impose sanctions on attorneys and parties under Federal Rule of Civil Procedure 11(c).[44]

E. A Cautionary Note

We conclude with a note of caution to the public regarding the reliability of court filings such as those unsealed today.

Materials submitted by parties to a court should be understood for what they are. They do not reflect the court's own findings. Rather, they are prepared by parties seeking to advance their own interests in an adversarial process. Although affidavits and depositions are offered "under penalty of perjury," it is in fact exceedingly rare for anyone to be prosecuted for perjury in a civil proceeding.[45] Similarly,

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[44] In relevant part, Rule 11 provides:

> By presenting to the court a pleading, written motion, or other paper . . . an attorney or unrepresented party certifies that . . . it is not being presented for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation . . . . [T]he court may impose an appropriate sanction on any attorney, law firm, or party that violated the rule or is responsible for the violation . . . . The sanction may include nonmonetary directives; an order to pay a penalty into court; or, if imposed on motion and warranted for effective deterrence, an order directing payment to the movant of part or all of the reasonable attorney's fees and other expenses directly resulting from the violation.

Fed. R. Civ. P. 11. *See also Amodeo II*, 71 F.3d at 1049 (describing sanctions available to the court).

[45] Sonia Sotomayor & Nicole A. Gordon, *Returning Majesty to the Law and Politics: A Modern Approach*, 30 Suffolk U. L. Rev. 35, 47 n.52 (1996) ("Perjury cases are not often pursued . . . .").

pleadings, complaints, and briefs—while supposedly based on underlying evidentiary material—can be misleading. Such documents sometimes draw dubious inferences from already questionable material or present ambiguous material as definitive.

Moreover, court filings are, in some respects, particularly susceptible to fraud. For while the threat of defamation actions may deter malicious falsehoods in standard publications, this threat is non-existent with respect to certain court filings. This is so because, under New York law (which governs the underlying defamation claim here), "absolute immunity from liability for defamation exists for oral or written statements made . . . in connection with a proceeding before a court."[46] Thus, although the act of filing a document with a court might be thought to lend that document additional credibility, in fact, allegations appearing in such documents might be less credible than those published elsewhere.[47]

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[46] *Front, Inc. v. Khalil*, 24 N.Y.3d 713, 718 (2015); *see also Kelly v. Albarino*, 485 F.3d 664, 666 (2d Cir. 2007) (adopting the reasoning of the District Court explaining that this privilege is "the broadest of possible privileges"); Restatement (Second) of Torts § 587 (1977) ("A party to a private litigation or a private prosecutor or defendant in a criminal prosecution is absolutely privileged to publish defamatory matter concerning another in communications preliminary to a proposed judicial proceeding, or in the institution of or during the course and as a part of, a judicial proceeding in which he participates, if the matter has some relation to the proceeding."). *But see* note 47, *post.*

[47] While common law courts have generally interpreted the litigation privilege broadly, they nevertheless maintain an important (if rarely implemented) limitation on its scope: to qualify for the privilege, a statement must be "material and pertinent to the questions involved." *Front*, 24 N.Y.3d at 718 (quoting *Youmans*

We have long noted that the press plays a vital role in ensuring the public right of access and in enhancing "the quality and safeguards the integrity of the factfinding process."[48] When faithfully observing its best traditions, the print and electronic media "contributes to public understanding of the rule of law" and "validates [its] claim of functioning as surrogates for the public."[49]

At the same time, the media does the public a profound disservice when it reports on parties' allegations uncritically. We have previously observed that courts cannot possibly "discredit every statement or document turned up in the course of litigation," and we have criticized "the use by the media of the somewhat misleading term 'court records' in referring to such items."[50] Even ordinarily critical

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v. Smith, 153 N.Y. 214, 219–20 (1897)). It follows, then, that immaterial and impertinent statements are (at least nominally) actionable, particularly when they are "so needlessly defamatory as to warrant the inference of express malice." *Id.* (same). It seems to us that when a district court strikes statements from the record pursuant to Fed. R. Civ. P. 12(f) on the ground that the matter is "impertinent" and "immaterial," it makes the very same determination that permits a defamation action under the common law. We think the judicial system would be well served were our common law courts to revitalize this crucial qualification to the litigation privilege.

[48] *Westmoreland v. Columbia Broad. Sys., Inc.*, 752 F.2d 16, 23 (2d Cir. 1984) (quoting *Globe Newspaper Co. v. Superior Court for Norfolk Cty.*, 457 U.S. 596, 606 (1982)).

[49] *Richmond Newspapers, Inc. v. Virginia*, 448 U.S. 555, 572–73 (1980) (plurality opinion) (internal quotation marks omitted).

[50] *Amodeo II*, 71 F.3d at 1049.

readers may take the reference to "court papers" as some sort of marker of reliability. This would be a mistake.

We therefore urge the media to exercise restraint in covering potentially defamatory allegations, and we caution the public to read such accounts with discernment.

III. CONCLUSION

To summarize, we hold as follows:

(1) Materials submitted in connection with a motion for summary judgment are subject to a strong presumption of public access.

(2) The summary judgment record at issue will be unsealed upon issuance of our mandate, subject to minimal redactions.[51]

(3) Materials submitted in connection with, and relevant to, discovery motions, motions *in limine*, and other non-dispositive motions are subject to a lesser—but still substantial— presumption of public access.

(4) The District Court is directed to review the remaining sealed materials individually and unseal those materials as appropriate.

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[51] *See* note 22, *ante*.

(5) District courts should exercise the full range of their substantial powers to ensure their files do not become vehicles for defamation.

For the foregoing reasons, we **VACATE** the orders of the District Court entered on November 2, 2016, May 3, 2017, and August 27, 2018, **ORDER** the unsealing of the summary judgment record as described herein, and **REMAND** the cause to the District Court for particularized review of the remaining materials.

In undertaking this task, the District Court may be well-served by ordering the parties to submit to the Court unredacted, electronic copies of the remaining sealed materials, as well as specific, proposed redactions. The District Court may also order the parties to identify and notify additional parties whose privacy interests would likely be implicated by disclosure of these materials.

In the interests of judicial economy, any future appeal in this matter shall be referred to this panel.

POOLER, *Circuit Judge, dissenting in part*:

I join the Court's opinion in every respect but one: the decision to unseal the summary judgment record ourselves. I agree that all or most of the material must be unsealed. Nevertheless, in my view, the district court is better suited to the task. As the Court's opinion recognizes in connection with the remaining sealed materials, the district court is better positioned to communicate with the parties and any nonparties whose privacy interests might be affected by unsealing. On that score, it is worth clarifying here the breadth of the Court's unsealing order: it unseals nearly 2000 pages of material. The task of identifying and making specific redactions in such a substantial volume is perilous; the consequences of even a seemingly minor error may be grave and are irrevocable. Moreover, although I share the majority's concern about avoiding delay, I would alleviate that concern through other means—perhaps with an order directing the district court to act expeditiously and by making clear what types of limited redactions are and are not appropriate. In sum, I would unseal the district court's summary judgment decision only and leave the remainder of the materials for the district court to review, redact, and unseal on remand.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--X

15-cv-07433-RWS

DEFENDANT'S STATEMENT OF MATERIAL UNDISPUTED
FACTS PURSUANT TO LOCAL CIVIL RULE 56.1

Laura A. Menninger
Jeffrey S. Pagliuca
HADDON, MORGAN, AND FOREMAN, P.C.
150 East 10th Avenue
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303.831.7364

Pursuant to Rule 56.1 of the Local Civil Rules of this Court, defendant Ghislaine Maxwell submits this statement of the material facts as to which she contends there is no genuine issues to be tried. Ms. Maxwell expressly preserves all of her objections to the admissibility of the evidence cited herein and in the accompanying memoranda of law and does not waive any objections by making this submission.

numbered.

1. **Ms. Maxwell's response to publications of plaintiff's false allegations: the March 2011 statement.** In early 2011 plaintiff in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. In the articles, plaintiff made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, plaintiff suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted.

2. In the articles, plaintiff alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state."

3. In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false."

4. The statement read in full:

> <u>Statement on Behalf of Ghislaine Maxwell</u>
>
> By Devonshires Solicitors, PRNE
> Wednesday, March 9, 2011
>
> London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*

> It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.
>
> In the circumstances, *Ms Maxwell is now proceeding to take legal action against those newspapers*.
>
> "I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.
>
> "A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.
>
> Media contact:
>
> Ross Gow
> Acuity Reputation
> Tel: +44-203-008-7790
> Mob: +44-7778-755-251
> Email: ross@acuityreputation.com
>
> Media contact: Ross Gow, Acuity Reputation, Tel: +44-203-008-7790, Mob: +44-7778-755-251, Email: ross at acuityreputation.com

5. **Plaintiff's gratuitous and "lurid" accusations in an unrelated action.** In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement.

6. Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion.

7. The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[] of Mr. Epstein and the Government owed them CVRA duties." Yet, "the bulk of the [motion] consists of copious factual details that [plaintiff] and [her co-movant] 'would prove . . . if allowed to join.'" Ms. Giuffre gratuitously included

provocative and "lurid details" of her alleged sexual activities as an alleged victim of sexual trafficking.

8. At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre's name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly.

9. As the district court noted in ruling on the joinder motion, Ms. Giuffre "name[d] several individuals, and she offers details about the type of sex acts performed and where they took place." The court ruled that "these lurid details are unnecessary": "The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . ., especially considering that these details involve *non-parties* who are not related to the respondent Government." Accordingly, "[t]hese unnecessary details shall be stricken." *Id.* The court then struck all Ms. Giuffre's factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. The court said the striking of the "lurid details" was a sanction for Ms. Giuffre's improper inclusion of them in the motion.

10. The district court found not only that the "lurid details" were unnecessary but also that the entire joinder motion was "entirely unnecessary." Ms. Giuffre and her lawyers knew the motion with all its "lurid details" was unnecessary because the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied plaintiff's joinder motion.

11. One of the non-parties Ms. Giuffre "named" repeatedly in the joinder motion was Ms. Maxwell. According to the "lurid details" of Ms. Giuffre included in the motion,

Ms. Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:

- Ms. Maxwell "approached" plaintiff in 1999 when plaintiff was "fifteen years old" to recruit her into the scheme.
- Ms. Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities."
- Ms. Maxwell was a "primary co-conspirator" with Epstein in his scheme.
- She "persuaded" plaintiff to go to Epstein's mansion "in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children."
- At the mansion, when plaintiff began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter."
- Epstein "with the assistance of" Ms. Maxwell "converted [plaintiff] into . . . a 'sex slave.'" *Id.* Plaintiff was a "sex slave" from "about 1999 through 2002."
- Ms. Maxwell also was a "co-conspirator in Epstein's sexual abuse."
- Ms. Maxwell "appreciated the immunity" she acquired under Epstein's plea agreement, because the immunity protected her from prosecution "for the crimes she committed in Florida."
- Ms. Maxwell "participat[ed] in the sexual abuse of [plaintiff] and others."
- Ms. Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [plaintiff]." *Id.* She shared the photos with Epstein.
- As part of her "role in Epstein's sexual abuse ring," Ms. Maxwell "connect[ed]" Epstein with "powerful individuals" so that Epstein could traffick plaintiff to these persons.
- Plaintiff was "forced to have sexual relations" with Prince Andrew in "[Ms. Maxwell's] apartment" in London. Ms. Maxwell "facilitated" plaintiff's sex with Prince Andrew "by acting as a 'madame' for Epstein."
- Ms. Maxwell "assist[ed] in internationally trafficking" plaintiff and "numerous other young girls for sexual purposes."
- Plaintiff was "forced" to watch Epstein, Ms. Maxwell and others "engage in illegal sexual acts with dozens of underage girls."

12. In the joinder motion, plaintiff also alleged she was "forced" to have sex with Harvard law professor Alan Dershowitz, "model scout" Jean Luc Brunel, and "many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders."

13. Plaintiff said after serving for four years as a "sex slave," she "managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years."

14. Plaintiff suggested the government was part of Epstein's "conspiracy" when it "secretly" negotiated a non-prosecution agreement with Eptstein precluding federal prosecution of Epstein and his "co-conspirators." The government's secrecy, plaintiff alleged, was motivated by its fear that plaintiff would raise "powerful objections" to the agreement that would have "shed tremendous public light on Epstein and other powerful individuals.

15. Notably, the other "Jane Doe" who joined plaintiff's motion who alleged she was sexually abused "many occasions" by Epstein was unable to corroborate any of plaintiff's allegations.

16. Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, plaintiff told Ms. Churcher of virtually *none* of the details she described in the joinder motion.

17. **Ms. Maxwell's response to plaintiff's "lurid" accusations: the January 2015 statement.** As plaintiff and her lawyers expected, before District Judge Marra in the CVRA action could strike the "lurid details" of plaintiff's allegations in the joinder motion, members of the media obtained copies of the motion.

18. At Mr. Barden's direction, on January 3, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing "a quotable statement on

behalf of Ms Maxwell." The email was sent to more than 6 and probably less than 30 media representatives. It was not sent to non-media representatives.

19. Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to plaintiff's allegations in the motion.

20. The email to the media members read:

> To Whom It May Concern,
> Please find attached a quotable statement on behalf of Ms Maxwell.
>
> No further communication will be provided by her on this matter.
> Thanks for your understanding.
> Best
> Ross
>
> Ross Gow
> ACUITY Reputation
>
> Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.
>
> Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.
>
> Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.
>
> Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

21. Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did not pass it through a public relations firm, such as Mr. Gow's firm, Acuity Reputation.

22. The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, he noted in the statement that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news."

23. Second, Mr. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that plaintiff's allegations were "defamatory." In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct.

24. Consistent with those two purposes, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a *quotable statement* on behalf of Ms Maxwell" (emphasis supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to plaintiff's December 30, 2014, allegations that would give the media Ms. Maxwell's response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

25. **Plaintiff's activities to bring light to the rights of victims of sexual abuse.** Plaintiff has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

26. Plaintiff created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse.

27. The "goal" of Victims Refuse Silence "was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse." Toward this end, plaintiff has "dedicated her professional life to helping victims of sex trafficking."

28. Plaintiff repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse.

29. On December 30, 2014, plaintiff publicly filed an "entirely unnecessary" joinder motion laden with "unnecessary," "lurid details" about being "sexually abused" as a "minor victim[]" by wealthy and famous men and being "trafficked" all around the world as a "sex slave."

30. The plaintiff's alleged purpose in filing the joinder motion was to "vindicate" her rights under the CVRA, expose the government's "secretly negotiated" "non-prosecution agreement" with Epstein, "*shed tremendous public light*" on Epstein and "other powerful individuals" that would undermine the agreement, and support the CVRA plaintiffs' request for documents that would show how Epstein "used his powerful political and social connections to secure a favorable plea deal" and the government's "motive" to aid Epstein and his "co-conspirators."

31. Plaintiff has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein's alleged "sex scheme."

32. **Republication alleged by plaintiff.** Plaintiff was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were "'published globally, including within the Southern District of New York,'" as plaintiff alleged in Paragraph 9 of Count I of her complaint. In response, plaintiff identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories.

33. In none of the nine instances was there any publication of the entire January 2015 statement.

34. Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in plaintiff's response to Interrogatory No. 6, in connection with the media's publication of portions of the January 2015 statement.

35. **Plaintiff's defamation action against Ms. Maxwell.** Eight years after Epstein's guilty plea, plaintiff brought this action, repeating many of the allegations she made in her CVRA joinder motion.

36. The complaint alleged that the January 2015 statement "contained the following deliberate falsehoods":

(a) That Giuffre's sworn allegations "against Ghislaine Maxwell are untrue."

(b) That the allegations have been "shown to be untrue."

(c) That Giuffre's "claims are obvious lies."

37. **Plaintiff lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell.** After leaving the Growing Together drug rehabilitation facility in 1999, plaintiff moved in with the family of a fellow patient. There she met, and became engaged to, her friend's brother, James Michael Austrich. She and Austrich thereafter

rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. Later, they stayed briefly with plaintiff's parents in the Palm Beach/ Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. Although plaintiff agreed to marry Austrich, she never had any intention of doing so.

38. **Plaintiff re-enrolled in high school from June 21, 2000 until March 7, 2002**. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, plaintiff re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. On September 20, 2001, Plaintiff then enrolled at Royal Palm Beach High School. A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. *Id.* Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Plaintiff remained enrolled at Survivor's Charter School until March 7, 2002. She was present 56 days and absent 13 days during her time there. *Id.* Plaintiff never received her high school diploma or GED. Plaintiff and Figueroa went "back to school" together at Survivor's Charter School. The school day there lasted from morning until early afternoon.

39. During the year 2000, plaintiff worked at numerous jobs. In 2000, while living with her fiancé, plaintiff held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. Her taxable earnings that year totaled nearly $9,000. Plaintiff cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs.

40. Plaintiff's employment at the Mar-a-Lago spa began in fall 2000. Plaintiff's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm

Beach, Florida, beginning on April 11, 2000. Mr. Roberts worked there year-round for approximately 3 years. After working there for a period of time, Mr. Roberts became acquainted with the head of the spa area and recommended plaintiff for a job there. Mar-a-Lago closes every Mother's Day and reopens on November 1. Most of employees Mar-a-Lago, including all employees of the spa area such as "spa attendants," are "seasonal" and work only when the club is open, i.e., between November 1 and Mother's Day. Plaintiff was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

41. **Plaintiff represented herself as a masseuse for Jeffrey Epstein.** While working at the Mar-a-Lago spa and reading a library book about massage, plaintiff met Ms. Maxwell. Plaintiff thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. Plaintiff's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. Plaintiff commenced employment as a traveling masseuse for Mr. Epstein. Plaintiff was excited about her job as a masseuse, about traveling with him and about meeting famous people. Plaintiff represented that she was employed as a masseuse beginning in January 2001. Plaintiff never mentioned Ms. Maxwell to her then-fiancé, Austrich. Plaintiff's father never met Ms. Maxwell.

42. **Plaintiff resumed her relationship with convicted felon Anthony Figueroa.** In spring 2001, while living with Austich, plaintiff lied to and cheated on him with her high school boyfriend, Anthony Figueroa. Plaintiff and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with plaintiff. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Plaintiff's presence punched Austrich in the face. Figueroa and plaintiff fled the scene before police arrived. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance.

43. **Plaintiff freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, plaintiff and Figueroa hosted a party with a number of guests. During the party, according to plaintiff, someone entered plaintiff's room and stole $500 from her shirt pocket. Plaintiff contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, plaintiff contacted the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. Again, plaintiff met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave."

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Plaintiff.** Flight logs maintained by Epstein's private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, <u>unaccompanied by Plaintiff</u>, between August 2001 and September 2002. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Plaintiff lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Plaintiff. During this same period of time, Plaintiff was employed at various jobs, enrolled in school, and living with her boyfriend.

45. **Plaintiff and Figueroa shared a vehicle during 2001 and 2002.** Plaintiff and Figueroa shared a '93 white Pontiac in 2001 and 2002. Plaintiff freely traveled around the Palm

Beach area in that vehicle. In August 2002, Plaintiff acquired a Dodge Dakota pickup truck from her father. Figueroa used that vehicle in a series of crimes before and after Plaintiff left for Thailand.

46. **Plaintiff held a number of jobs in 2001 and 2002**. During 2001 and 2002, plaintiff was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM).

47. **In September 2002, Plaintiff traveled to Thailand to receive massage training and while there, met her future husband and eloped with him.** Plaintiff traveled to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of $4,000. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016.

48. **Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography.** Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. That investigation commenced in 2005. Recarey worked only on the Epstein case for an entire year. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. Detective Recarey's investigation

revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. Maxwell was not seen coming or going from the house during the law enforcement surveillance of Epstein's home. The arrest warrant did not mention Ms. Maxwell and her name was never mentioned before the grand jury. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. Detective Recarey also has no knowledge of Plaintiff's conduct that is subject of this lawsuit.

49. **No nude photograph of Plaintiff was displayed in Epstein's home.** Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia Roberts in Mr. Epstein's house." Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office.

50. **Plaintiff intentionally destroyed her "journal" and "dream journal" regarding her "memories" of this case in 2013 while represented by counsel.** Plaintiff drafted a "journal" describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her

possession. *Id.* Plaintiff also kept a "dream journal" regarding her thoughts and memories that she possessed in January 2016. To date, Plaintiff cannot locate the "dream journal."

51. **Plaintiff publicly peddled her story beginning in 2011.** Plaintiff granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with plaintiff and her "attorneys or other agents" from "early 2011" to "the present day." Plaintiff received approximately $160,000 for her stories and pictures that were published by many news organizations.

52. **Plaintiff drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish.** In 2011, contemporaneous with her Churcher interviews, plaintiff drafted a book manuscript which purported to document plaintiff's experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Plaintiff communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

53. **Plaintiff's publicly filed "lurid" CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz.** On December 30, 2014, plaintiff, through counsel, publicly filed a joinder motion that contained her "lurid allegations" about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a "corrected" motion and two further declarations in January and February 2015, which repeated many of plaintiff's claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between plaintiff's lawyers, Edwards and Cassell, and Alan Dershowitz. After plaintiff publicly

alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called plaintiff a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations.

54. **Plaintiff formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy.** In 2014, plaintiff, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to plaintiff, the purpose of the organization is to promote plaintiff's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Plaintiff attempts to promote Victims Refuse Silence at every opportunity. For example, plaintiff participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

Dated: January 6, 2017

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Defendant's Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1* via ECF on the following:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--X

15-cv-07433-RWS

Memorandum of Law in Support of Defendant's Motion for Summary Judgment

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PRELIMINARY STATEMENT

FACTS

The following facts are undisputed. Additional undisputed facts are set forth in specific argument sections. All paragraphs containing undisputed facts will be sequentially numbered.

1. **Ms. Maxwell's response to publications of plaintiff's false allegations: the March 2011 statement.** In early 2011 plaintiff in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. EXHIBITS A-B.[1] In the articles, plaintiff made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution.[2] Nonetheless, plaintiff suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted. *See generally* EXHIBITS A-B.

2. In the articles, plaintiff alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state." *Id.* at 5.

3. In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false." EXHIBIT C.

4. The statement read in full:

[1]The articles were attached as exhibits to the author Sharon Churcher's declaration in support of her motion to quash an SDT issued to her. *See* Doc.216-2 & 216-3.

[2]Doc.1 ¶¶ 11, 14.

> <u>Statement on Behalf of Ghislaine Maxwell</u>
>
> By Devonshires Solicitors, PRNE
> Wednesday, March 9, 2011
>
> London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*
>
> It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.
>
> In the circumstances, *Ms Maxwell is now proceeding to take legal action against those newspapers*.
>
> "I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.
>
> "A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.
>
> Media contact:
>
> Ross Gow
> Acuity Reputation
> Tel: +44-203-008-7790
> Mob: +44-7778-755-251
> Email: ross@acuityreputation.com
>
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EXHIBIT C (emphasis supplied; capitalization altered). We refer to this as "the March 2011 statement."

5. **Plaintiff's gratuitous and "lurid" accusations in an unrelated action.** In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement. *See* EXHIBIT D, at 2.

6. Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion. EXHIBIT D, at 1, 9.

7. The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[] of Mr. Epstein and the Government owed them CVRA duties," EXHIBIT E, at 5. Yet, the court noted, "the bulk of the [motion] consists of copious factual details that [plaintiff] and [her co-movant] 'would prove . . . if allowed to join.'" *Id.* (brackets omitted). Ms. Giuffre gratuitously included provocative and "lurid details" of her alleged sexual activities as an alleged victim of sexual trafficking. *Id.*

8. At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre's name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly. EXHIBIT D, at 1 & n.1.

9. As the district court noted in ruling on the joinder motion, Ms. Giuffre "name[d] several individuals, and she offers details about the type of sex acts performed and where they took place." EXHIBIT E, at 5. The court ruled that "these lurid details are unnecessary": "The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . ., especially considering that these details involve *non-parties* who are not related to the respondent Government." *Id.* Accordingly, "[t]hese unnecessary details shall be stricken." *Id.* The court then struck all Ms. Giuffre's factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. *Id.* at 5-6. The court

said the striking of the "lurid details" was a sanction for Ms. Giuffre's improper inclusion of them in the motion. *See id.* at 6-7.

10. The district court found not only that the "lurid details" were unnecessary but also that the entire joinder motion was "entirely unnecessary," *id.* at 7. Ms. Giuffre and her lawyers knew the motion with all its "lurid details" was unnecessary because, as the court pointed out, the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. *See id.* at 7-8; *see also id.* at 8 (noting that in the motion, Ms. Giuffre's lawyers said that "regardless of whether this Court grants the . . . Motion, 'they will call [her] as a witness at any trial'"). The court denied plaintiff's joinder motion. *Id.* at 10.

11. One of the non-parties Ms. Giuffre "named" repeatedly in the joinder motion was Ms. Maxwell. EXHIBIT D, at 3-6. According to the "lurid details" of Ms. Giuffre included in the motion, Ms. Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:

- Ms. Maxwell "approached" plaintiff in 1999 when plaintiff was "fifteen years old" to recruit her into the scheme. *Id.* at 3.
- Ms. Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities." *Id.*
- Ms. Maxwell was a "primary co-conspirator" with Epstein in his scheme. *Id.*
- She "persuaded" plaintiff to go to Epstein's mansion "in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children." *Id.*
- At the mansion, when plaintiff began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter." *Id.*
- Epstein "with the assistance of" Ms. Maxwell "converted [plaintiff] into . . . a 'sex slave.'" *Id.* Plaintiff was a "sex slave" from "about 1999 through 2002." *Id.*
- Ms. Maxwell also was a "co-conspirator in Epstein's sexual abuse." *Id.* at 4.

- Ms. Maxwell "appreciated the immunity" she acquired under Epstein's plea agreement, because the immunity protected her from prosecution "for the crimes she committed in Florida." *Id.*

- Ms. Maxwell "participat[ed] in the sexual abuse of [plaintiff] and others." *Id.*

- Ms. Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [plaintiff]." *Id.* She shared the photos with Epstein. *Id.*

- As part of her "role in Epstein's sexual abuse ring," Ms. Maxwell "connect[ed]" Epstein with "powerful individuals" so that Epstein could traffick plaintiff to these persons. *Id.*

- Plaintiff was "forced to have sexual relations" with Prince Andrew in "[Ms. Maxwell's] apartment" in London. *Id.* Ms. Maxwell "facilitated" plaintiff's sex with Prince Andrew "by acting as a 'madame' for Epstein." *Id.*

- Ms. Maxwell "assist[ed] in internationally trafficking" plaintiff and "numerous other young girls for sexual purposes." *Id.*

- Plaintiff was "forced" to watch Epstein, Ms. Maxwell and others "engage in illegal sexual acts with dozens of underage girls." *Id.*

12. In the joinder motion, plaintiff also alleged she was "forced" to have sex with Harvard law professor Alan Dershowitz, "model scout" Jean Luc Brunel, and "many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders." *Id.* at 4-6.

13. Plaintiff said after serving for four years as a "sex slave," she "managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years." *Id.* at 3.

14. Plaintiff suggested the government was part of Epstein's "conspiracy" when it "secretly" negotiated a non-prosecution agreement with Epstein precluding federal prosecution of Epstein and his "co-conspirators." *Id.* at 6. The government's secrecy, plaintiff alleged, was motivated by its fear that plaintiff would raise "powerful objections" to the agreement that would have "shed tremendous public light on Epstein and other powerful individuals. *Id.* at 6-7.

15. Notably, the other "Jane Doe" who joined plaintiff's motion who alleged she was sexually abused "many occasions" by Epstein was unable to corroborate any of plaintiff's allegations. *See id.* at 7-8.

16. Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, plaintiff told Ms. Churcher virtually *none* of the details she described in the joinder motion. *See* EXHIBIT A-B.

17. **Ms. Maxwell's response to plaintiff's "lurid" accusations: the January 2015 statement.** As plaintiff and her lawyers expected, before District Judge Marra in the CVRA action could strike the "lurid details" of plaintiff's allegations in the joinder motion, members of the media obtained copies of the motion. *See* EXHIBIT G, at 31:2-36:4 & Depo.Exs.3-4.

18. At Mr. Barden's direction, on January 2, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing "a quotable statement on behalf of Ms Maxwell." EXHIBIT F; EXHIBIT G, at 33:8-23. The email was sent to more than 6 and probably less than 30 media representatives. *See* EXHIBIT G, at 33:8-34:3. It was not sent to non-media representatives. *See id.* at 31:2-35:21.

19. Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. *See, e.g.*, EXHIBIT F. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to plaintiff's allegations in the motion. *See, e.g.*, EXHIBIT G, at 30:23-35:21 & Depo.Ex.3.

20. The email to the media members read:

> To Whom It May Concern,
> Please find attached a quotable statement on behalf of Ms Maxwell.

> No further communication will be provided by her on this matter.
> Thanks for your understanding.
> Best
> Ross
>
> Ross Gow
> ACUITY Reputation
>
> Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.
>
> Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.
>
> Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.
>
> Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

EXHIBIT F (emphasis supplied). We refer to this email as "the January 2015 statement."

21. Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did engage a public relations firm, such as Mr. Gow's firm Acuity Reputation, to prepare the statement. *See* EXHIBIT K ¶¶ 10,15.

22. The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. He believed this could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, he noted in the statement that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news." *Id.* ¶ 11.

23. Second, Mr. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that plaintiff's allegations were "defamatory." In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct. *Id.* ¶ 17.

24. Consistent with those two purposes, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a *quotable statement* on behalf of Ms Maxwell" (emphasis supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to plaintiff's December 30, 2014, allegations that would give the media Ms. Maxwell's response. *Id.* ¶ 19. The purpose of the prefatory statement was to inform the media-recipients of this intent. *Id.*

25. **Plaintiff's activities to bring light to the rights of victims of sexual abuse.** Plaintiff has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

26. Plaintiff created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse. Doc.1 ¶¶ 24-25.

27. The "goal" of Victims Refuse Silence "was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse." *Id.* ¶ 25. Toward this end, plaintiff has "dedicated her professional life to helping victims of sex trafficking." *Id.*

28. Plaintiff repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse. *See* This Motion at ¶¶ 51-54.

29. As discussed above, on December 30, 2014, plaintiff publicly filed an "entirely unnecessary"[3] joinder motion laden with what Judge Marra described as "unnecessary,"[4] "lurid details"[5] about being "sexually abused" as a "minor victim[]" by wealthy and famous men and being "trafficked" all around the world as a "sex slave." EXHIBIT D, at 1 n.1, 3-6.

30. The plaintiff's alleged purpose in filing the joinder motion was to "vindicate" her rights under the CVRA, expose the government's "secretly negotiated" "non-prosecution agreement" with Epstein, "*shed tremendous public light*" on Epstein and "other powerful individuals" that would undermine the agreement, and support the CVRA plaintiffs' request for documents that would show how Epstein "used his powerful political and social connections to secure a favorable plea deal" and the government's "motive" to aid Epstein and his "co-conspirators." *See* EXHIBIT D, at 1, 6-7, 10 (emphasis supplied).

31. Plaintiff has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein's alleged "sex scheme." EXHIBIT KK.

32. **Republication alleged by plaintiff.** Plaintiff[6] was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were "'published globally, including

[3] EXHIBIT E, at 7.

[4] *Id.* at 5.

[5] *Id.*

[6] The undisputed facts relevant to this Motion are contained in the Facts section, above, and within each argument as appropriate. The undisputed facts will be sequentially numbered throughout this Motion.

within the Southern District of New York,'" as plaintiff alleged in Paragraph 9 of Count I of her complaint. In response, plaintiff identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories. EXHIBIT H, at 7-8; EXHIBIT I, at 4.

33. In none of the nine instances was there any publication of the entire January 2015 statement. *See* EXHIBIT H, at 7-8; EXHIBIT I, at 4.

34. Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in plaintiff's response to Interrogatory No. 6, in connection with the media's publication of portions of the January 2015 statement. EXHIBIT J ¶ 24; EXHIBIT K ¶¶ 2-3..

35. **Plaintiff's defamation action against Ms. Maxwell.** Eight years after Epstein's guilty plea, plaintiff brought this action, repeating many of the allegations she made in her CVRA joinder motion. *See* Doc.1 ¶ 9.

36. The complaint alleged that the January 2015 statement "contained the following deliberate falsehoods":

(a) That Giuffre's sworn allegations "against Ghislaine Maxwell are untrue."

(b) That the allegations have been "shown to be untrue."

(c) That Giuffre's "claims are obvious lies."

Doc.1 ¶ 30 (boldface and underscoring omitted).

SUMMARY JUDGMENT STANDARD

"[C]ourts should not be reluctant to grant summary judgment in appropriate cases. 'One of the principal purposes of the summary judgment rule is to isolate and dispose of factually insupportable claims,' thereby permitting courts to avoid 'protracted, expensive and harassing trials.'" *Don King Prods., Inc. v. Douglas*, 742 F. Supp. 778, 780 (S.D.N.Y. 1990) (quoting

Celotex Corp. v. Catrett, 477 U.S. 317, 323-24 (1986), and *Meiri v. Dacon*, 759 F.2d 989, 998 (2d Cir. 1985)). Where summary judgment is sought under Article I, Section 8, of the New York Constitution, the New York Court of Appeals has declared, "we reaffirm our regard for the particular value of summary judgment, where appropriate, in libel cases," *Immuno AG v. Moor-Jankowski*, 567 N.E.2d 1270, 1282 (N.Y. 1991), particularly when as here a defendant is challenging a defamation claim under the "independent State law approach" articulated in *Immuno AG* that might make summary disposition more likely than under a federal approach, *see id.*

Summary judgment is appropriate where "there is no genuine issue as to any material fact and . . . the moving party is entitled to a judgment as a matter of law." Fed. R. Civ. P. 56(c). The relevant inquiry on application for summary judgment is "whether the evidence presents a sufficient disagreement to require submission to a jury or whether it is so one-sided that one party must prevail as a matter of law." *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 251-52 (1986).

"[T]he mere existence of *some* alleged factual dispute between the parties will not defeat an otherwise properly supported motion for summary judgment; the requirement is that there be no *genuine* issue of *material* fact." *Id.* at 247-48. The substantive law determines what facts are material. *Id.* at 248. "Only disputes over facts that might affect the outcome of the suit under the governing law will properly preclude the entry of summary judgment. Factual disputes that are irrelevant or unnecessary will not be counted." *Id.* A dispute about a material fact is "genuine" if the evidence is such that a reasonable jury could return a verdict for the nonmoving party." *Id.*

In the face of a properly supported summary judgment motion, the plaintiff may not "rest on [the] allegations" in her complaint. *Id.* at 249. The trial court's function is to determine

whether there is a genuine issue for trial, and "there is no issue for trial unless there is sufficient evidence favoring the nonmoving party for a jury to return a verdict for that party." *Id.*

"[T]he plain language of Rule 56(c) mandates the entry of summary judgment . . . against a party who fails to make a showing sufficient to establish the existence of an element essential to that party's case, and on which that party will bear the burden of proof at trial." *Celotex Corp. v. Catrett*, 477 U.S. 317, 322 (1986). In such a situation, "there can be 'no genuine issue as to any material fact,' since a complete failure of proof concerning an essential element of the nonmoving party's case necessarily renders all other facts immaterial. The moving party is 'entitled to a judgment as a matter of law' because the nonmoving party has failed to make a sufficient showing on an essential element of her case with respect to which she has the burden of proof." *Id.* at 323; *see* Fed. R. Civ. P. 56 advisory committee's notes (2010 amendments) (restoration of "*shall* grant summary judgment" was intended to "express the direction to grant summary judgment, and "avoids the unintended consequences of any other word").

ARGUMENT

I. Ms. Maxwell is not liable for republications of her January 2015 statement that she did not authorize or request and by entities she did not control.

A. Summary judgment is warranted to the extent plaintiff seeks to impose liability on any media's republication of all or a portion of the January 2015 statement.

Messrs. Barden and Gow, acting on behalf of Ms. Maxwell, caused the January 2015 statement to be transmitted—published—to various individuals employed by media organizations. The question presented in this Argument I is whether Ms. Maxwell is liable for any republication of all or a portion of the January 2015 statement by the media. Under New York law, the answer is no.

Liability for a republication "must be based on *real authority to influence the final product*." *Davis v. Costa-Gavras*, 580 F. Supp. 1082, 1096 (S.D.N.Y. 1984) (emphasis supplied).

"[W]here a defendant 'had no actual part in composing or publishing,' he cannot be held liable 'without disregarding the settled rule of law that no man is bound for the tortious act of another over whom he has not a master's power of control.'" *Id.* (quoting *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906)); *see Geraci v. Probst*, 938 N.E.2d 917, 921 (N.Y. 2010) (holding that defendant was not liable for republication, in part because "there is no indication that Probst had any control over whether or not Newsday published the article"). "Conclusive evidence of lack of actual authority [is] sufficiently dispositive that the [trial court] 'ha[s] no option but to dismiss the case . . . .'" *Id.* (quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

As the New York Court of Appeals held in *Geraci*:

> It is too well settled to be now questioned that one who . . . prints and publishes a libel[] is not responsible for its voluntary and unjustifiable repetition, without his authority or request, by others over whom he has no control and who thereby make themselves liable to the person injured, and that such repetition cannot be considered in law a necessary, natural and probable consequence of the original slander or libel.

938 N.E.2d at 921 (internal quotations and citation omitted). The rationale behind this rule is that "each person who repeats the defamatory statement is responsible for the resulting damages." *Id.* (internal quotations omitted).

With the goal of garnering maximum publicity and defaming Ms. Maxwell, Ms. Giuffre filed an "entirely unnecessary"[7] joinder motion with "lurid details" about sexual acts for the purpose of attracting the attention of the public, which was "'curious, titillated or intrigued'"[8] about alleged sexual acts and relationships among the rich and famous. In defense of Ms. Maxwell's reputation, Messrs. Barden and Gow responded with the January 2015 statement.

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[7] EXHIBIT E, at 7.

[8] *Time, Inc. v. Firestone*, 424 U.S. 448, 488 n.1 (1976) (Marshall, J., dissenting) (quoting *Firestone v. Time, Inc.*, 271 So. 2d 745, 752 (Fla. 1972)).

The email transmitting the statement explained it was "a *quotable statement* on behalf of Ms Maxwell" and "[n]o further communication will be provided by her on this matter." EXHIBIT F (emphasis supplied). The media representatives were notified that if they intended to use the statement, it was to be quoted in its entirety. *See* This Motion ¶ 24, at 8. Ms. Maxwell and Messrs. Barden and Gow had no ability to control whether or how the media-recipients would use the statement, and they made no effort to control whether or how they would use the statement. EXHIBIT K ¶¶ 2-3; EXHIBIT J ¶ 24.

Ms. Maxwell is not responsible for any republication of the January 2015 statement, whether it was republished in whole or in part,[9] since she had no authority or control over any media that published any portion of it. In the words of this Court, she had no "real authority to influence the final product," *Davis*, 580 F. Supp. at 1096.

The media's *selective*, *partial* republication of the statement is more problematic yet. An original publisher of a statement cannot be charged with a republisher's "editing and excerpting of her statement." *Rand v. New York Times Co.*, 430 N.Y.S.2d 271, 275 (App. Div. 1980). The rule applies with even greater force where as here a defamation claim is grounded on the expression of opinion: An individual "cannot be liable for the republication of a derogatory but constitutionally protected opinion when the foundation upon which that opinion is based is omitted. The defamatory remark should be 'read against the background of its issuance.'" *Id.* (quoting *Mencher v. Chesley*, 75 N.E.2d 257, 259 (N.Y. 1947), and citing *James v. Gannett Co.*, 353 N.E.2d 834, 838 (N.Y. 1976)).

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[9]Plaintiff has not disclosed under Fed. R. Civ. P. 26(a)(1)(A)(ii) any republication of the entirety of the January 2015 statement. In response to our discovery requests requiring her to identify republications of all or a portion of the statement, plaintiff identified no republication of the entirety of the statement.

The rationale for this rule is found in the New York Court of Appeals' explanation of how an original publisher's allegedly defamatory statement should be interpreted:

> The statement complained of will be read against the background of its issuance with respect to the circumstances of its publication. It is the duty of the court, in an action for libel, to understand the publication in the same manner that others would naturally do. *The construction which it behooves a court of justice to put on a publication which is alleged to be libelous is to be derived as well from the expressions used as from the whole scope and apparent object of the writer*.

James, 353 N.E.2d at 838 (emphasis supplied; citations and internal quotations omitted).

The January 2015 statement was intended to be read *by the media-recipients* in its entirety. **One**, it was intended to be a comprehensive, one-time-only response to all of plaintiff's lurid and false allegations of sexual and other misconduct by Ms. Maxwell. *See* EXHIBIT J ¶ 13. **Two**, the statement was complex in that it could not be quoted partially and out of context and still convey the intended meaning. Among other things, the statement was intended to show *why* plaintiff could not be believed—why her allegations are "obvious lies"—by pointing out how her story changed each time she retold the story. As Mr. Barden explains:

> Selective and partial quotation and use of the statement would disserve my purposes. It was intended to address Plaintiff's behavior and allegations against Ms. Maxwell on a broad scale, that is to say, Plaintiff's history of making false allegations and innuendo to the media against Ms. Maxwell. This is why the statement references Plaintiff's "original allegations" and points out that her story "changes"—i.e. is embellished—over time including the allegations "now" that Professor Dershowitz allegedly had sexual relations with her. This is why I distinguished in the statement between Plaintiff's "original" allegations and her "new," joinder-motion allegations, which differed substantially from the original allegations. And this is why I wrote, "Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by [Plaintiff] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies." (Emphasis supplied.) Having established the dramatic difference between Plaintiff's two sets of allegations, which suggested she was fabricating more and more-salacious allegations as she had more time to manufacture them, I added the third paragraph: "[Ms. Giuffre's] claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory." (Emphasis supplied.) I believed then, and believe now, that it was and remains a fair inference and conclusion that her claims were and are "obvious

> lies." As noted, her claims not to have slept with Prince Andrew and to have slept with Prince Andrew are a classic example of an obvious lie. One or other account is on the face of it a lie.

EXHIBIT J ¶ 20. That Mr. Barden on behalf of Ms. Maxwell was expressing his *opinion*—in the form of a legal argument—as a lawyer would be lost if words and phrases are extracted from and used outside the context of the January 2015 statement. Yet, this is precisely what the media did in their articles on the statement and what plaintiff did in her complaint (*see* Doc.1 ¶ 30). **Finally**, the statement was intended to be a "shot across the bow" of the media-recipients so that they understood the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct. *See id.* ¶ 17. Selectively excerpting from the statement would seriously undermine this purpose by changing the force of the message to the media-recipients.

Under these circumstances, selective, partial and out-of-context republication of Mr. Barden's deliberate and carefully crafted message to the media-representatives, as a matter of law, cannot result in defamation liability for Ms. Maxwell. Accordingly, the Court should enter partial summary judgment.

B. Because plaintiff is a limited public figure, imposing liability upon Ms. Maxwell for republication of the January 2015 statement would violate the First Amendment.

As this Court recognized in *Davis*, *New York Times v. Sullivan*[10] and its progeny "preclude states from imposing liability without fault in actions for defamation, especially by public figures." 580 F. Supp. at 1097 (citing, *inter alia*, *Gertz v. Robert Welch, Inc.*, 418 U.S. 323 (1974)). This principle precludes the imposition of liability for republication of an allegedly

[10] 376 U.S. 254 (1964).

defamatory statement on a party who had no "actual . . . responsibility for the decision to republish" the statement. *Id.*

A public figure includes a person who "voluntarily injects himself or is drawn into a particular public controversy and thereby becomes a public figure for a limited range of issues." *Gertz*, 418 U.S. at 351; *see, e.g.*, *James*, 353 N.E.2d at 839 (public figure includes those who have "thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved"). The evidence that plaintiff is a public figure is overwhelming, particularly in connection with the subject matters and issues addressed by and underlying the January 2015 statement. *See* This Motion ¶¶ 51-54.

In the case at bar, Ms. Maxwell and her agents had no responsibility for any media organization's decision to republish the January 2015 statement, and they did not participate in any such decision. *See* EXHIBITS J ¶ 24 & K ¶¶ 2-3. Liability for republication by media organizations of the January 2015 statement therefore is precluded under the First Amendment.

C. Plaintiff should be barred from introducing into evidence any republication of an excerpt from the January 2015 statement.

In *Geraci*, the plaintiff suggested in a letter to the Long Island fire district where defendant was a commissioner that defendant had engaged in self-dealing in the district's purchase of fire trucks. At trial the plaintiff sought to introduce into evidence portions of a Newsday article that republished parts of the defendant's letter. Defense counsel objected, arguing it was inflammatory and prejudicial. Plaintiff's counsel later argued the article "was not being offered as a republication, but on the issue of damages to show how far the allegations had circulated." 938 N.E.2d at 920. Additionally, plaintiff's counsel argued that the defendant "should have reasonably anticipated" that his letter to the fire district "would be newsworthy." *Id.* The trial court admitted the article, and the Appellate Division affirmed.

The New York Court of Appeals reversed. The risk of admitting such evidence, the court held, is the jury may "charge against defendant a separate, distinct libel (not pleaded in [the] complaint) by someone else, contrary to the rule that [t]he original publisher of a libel is not responsible for its subsequent publication by others." *Geraci*, 938 N.E.2d at 921. Accordingly, the court held, "'[A]bsent a showing that [defendant] *approved or participated in some other manner in the activities of the third-party republisher*[,]' there is no basis for allowing the jury to consider the article containing the republished statement as a measure of plaintiff's damages attributable to defendants." *Id.* (emphasis supplied; quoting *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557, 560 (1980)).

Neither Ms. Maxwell nor her agents approved or participated in any activity of any media organization in its decision to publish or not to publish any part of the January 2015 statement. EXHIBIT J ¶ 2; K ¶¶ 2-3.. Accordingly, "there is no basis for allowing the jury to consider [any] article containing the republished statement as a measure of plaintiff's damages attributable to [Ms. Maxwell]," *id.* Plaintiff should be barred from introducing any evidence of any republication of the January 2015 statement by any non-party. *See, e.g.*, *Soley v. Wasserman*, No. 8 CIV. 9262 KMW FM, 2013 WL 3185555, at *8 (S.D.N.Y. June 21, 2013) (precluding plaintiff from adducing evidence intended to establish claim on which court had entered partial summary judgment).

II. Summary judgment is warranted under the New York Constitution.

A. The January 2015 statement constitutes nonactionable opinion.

"'Whether particular words are defamatory presents a legal question to be resolved by the court in the first instance.'" *Germain v. M & T Bank Corp.*, 111 F. Supp. 3d 506, 534 (S.D.N.Y. 2015) (brackets omitted; quoting *Celle v. Filipino Reporter Enters. Inc.*, 209 F.3d 163,

177 (2d Cir. 2000)); *accord, e.g.*, *Aronson v. Wiersma*, 483 N.E.2d 1138, 1139 (N.Y. 1985). New York defamation law applies. Doc.37 at 6 n.2.

"It is a settled rule that expressions of an opinion false or not, libelous or not, are constitutionally protected and may not be the subject of private damage actions." *Steinhilber v. Alphonse*, 501 N.E.2d 550, 550 (N.Y. 1986) (internal quotations omitted). Whether a challenged statement is fact or opinion is a question of law to be decided by the Court. *Enigma Software Grp. USA, LLC v. Bleeping Computer LLC*, No. 16 CIV. 57 (PAE), 2016 WL 3773394, at *11 (S.D.N.Y. July 8, 2016); *accord, e.g.*, *Steinhilber*, 501 N.E.2d at 553.

In *Immuno AG v. Moor-Jankowski*,[11] the New York Court of Appeals declared that the New York Constitution provides greater protection to opinion than the First Amendment of the United States Constitution. The court recognized that in *Milkovich v. Lorain Journal Co.*, 497 U.S. 1 (1990), the United States Supreme Court reversed a state court decision dismissing a complaint on the ground that the allegedly defamatory statement was nonactionable opinion. The Supreme Court held there is no "wholesale defamation exemption" protecting opinion. The First Amendment analysis under *Milkovich*, the New York court observed, was one-dimensional: the trial court should look first to the allegedly defamatory statement's specific words as commonly understood and then determine whether the statements were "verifiable"; if the statements were verifiable, then they were actionable statements of fact. *See Immuno AG*, 567 N.E.2d at 1274-75. The Supreme Court's holding made it clear that it would not consider as part of the First Amendment analysis "the full context of the article in which the challenged statements appear, and the broader social context or setting surrounding the communication." *Id.* at 1274.

[11] 567 N.E.2d 1270 (N.Y. 1991).

The *Immuno AG* Court of Appeals held that Article I, Section 8, of the New York Constitution required a multidimensional approach to the determination whether an allegedly defamatory statement constitutes constitutionally protected opinion. The court gave numerous reasons. New York's "expansive" constitutional guarantee of speech was formulated and adopted before the application of the First Amendment to the states; "[i]t has long been our standard in defamation actions" to consider factors beyond whether facts are "verifiable"; and the court was concerned that if "'type of speech' is to be construed narrowly[,] . . . insufficient protection may be accorded to central values protected by the law of this State." *Id.* at 1277-78. The *Immuno AG* court reaffirmed that where a defendant alleges that the subject statement is opinion, *Steinhilber* supplies the analytical framework. *Id.* at 1280.

Steinhilber held that whether an allegedly defamatory statement is fact or nonactionable opinion should be decided based on four factors: (1) an assessment of whether the specific language in issue has a precise meaning which is readily understood or whether it is indefinite and ambiguous; (2) a determination of whether the statement is capable of being objectively characterized as true or false; (3) an examination of the full context of the communication in which the statement appears; and (4) a consideration of the broader social context or setting surrounding the communication including the existence of any applicable customs or conventions which might signal to readers or listeners that what is being read or heard is likely to be opinion, not fact. 501 N.E.2d at 554.

Application of these factors to the January 2015 statement compels the conclusion that the allegedly defamatory words, phrases and clauses are nonactionable opinion.

Whether the specific language in issue has a precise meaning which is readily understood or whether it is indefinite and ambiguous. The three sentences plaintiff alleges are

defamatory are indefinite and ambiguous. The first says plaintiff's "allegations" against Ms. Maxwell are "untrue." But plaintiff has made many dozens of allegations against Ms. Maxwell, and some are provably false. *See* This Motion, at ¶¶ 37-50. The statement does not specify *which* of the allegations are untrue. The second statement is that the "original allegations" have been "shown to be untrue." The "original allegations" were first revealed in the 2011 Churcher articles. Plaintiff made many dozens of allegations "originally." The statement does not specify *which* of the "original" allegations were shown to be untrue. Some *have* been shown to be untrue. *See* This Motion, at 53-65. The third statement is that plaintiff's "claims" are "obvious lies." This too is indefinite and ambiguous. Plaintiff has made many dozens of claims. The statement does not specify which ones are being referenced. More importantly, it does not say how or why some of the claims are "obvious" lies. Regardless, some of plaintiff's claims are "obvious lies." *See* This Motion, at 53-65.

Whether the three sentences in the January 2015 statement are capable of being objectively characterized as true or false. Can the three sentences be characterized as true or false? They cannot, because the statement does not specify which of the many dozens of allegations plaintiff has made are "untrue" and "shown to be untrue," and which of plaintiff's many dozens of "claims" are "obvious lies."

It is axiomatic that the plural form of a word, e.g., "allegations" and "claims," universally denotes—only—"*more than one*," *People v. Kocsis*, 28 N.Y.S.3d 466, 471 (App. Div. 2016) (emphasis supplied). *See, e.g.*, *Lehman Bros. Commercial Corp. v. Minmetals Int'l Non-Ferrous Metals Trading Co.*, No. 94 CIV. 8301(JFK), 1995 WL 380119, at *6 n.2 (S.D.N.Y. June 26, 1995). So for *Steinhilber* purposes it is dispositive of the fact versus opinion question if we can

identify *two* instances in which plaintiff's allegations or claims[12] are incapable of being proved true or false. Such examples abound. It cannot be proven true or false whether Ms. Maxwell "appreciated the immunity granted"[13] under the Epstein plea agreement or whether she "act[ed] as a 'madame' for Epstein."[14] That is because these are plaintiff's counsel's arguments or opinions. The January 2015 statement asserts that these allegations/claims are "false" or "obvious lies." That assertion cannot be proven true or false under *Steinhilber*.

The full context of the communication in which the statement appears. This factor "is often the key consideration in categorizing a statement as fact or opinion." *Davis v. Boeheim*, 22 N.E.3d 999, 1006 (N.Y. 2014) (internal quotations omitted).

In deciding whether a statement is defamatory, "[t]he words must be construed in the context of the entire statement or publication as a whole, tested against the understanding of the average reader." *Aronson v. Wiersma*, 483 N.E.2d 1138, 1139 (1985); *accord Elias v. Rolling Stone LLC*, No. 15-CV-5953 (PKC), 2016 WL 3583080, at *6 (S.D.N.Y. June 28, 2016). "It is the duty of the court, in an action for libel, to understand the publication in the same manner that others would naturally do. The construction which it behooves a court of justice to put on a publication which is alleged to be libelous is to be derived as well from the expressions used as

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[12]In the context of the January 2015 statement, an "allegation" is synonymous with a "claim." *See, e.g.*, *Maule v. Philadelphia Media Holdings, LLC*, No. CIV.A. 08-3357, 2010 WL 914926, at *10 (E.D. Pa. Mar. 15, 2010); *see generally* Black's Law Dictionary 68 (5th ed. 1979) (defining "allegation" as "[t]he assertion, *claim*, declaration, or statement of a party to an action, made in a pleading, setting out what he expects to prove"), *quoted with approval in Martin v. City of Oceanside*, 205 F. Supp. 2d 1142, 1147 (S.D. Cal. 2002), *aff'd*, 360 F.3d 1078 (9th Cir. 2004).

[13]EXHIBIT D, at 4.

[14]*Id.*

from the whole scope and apparent object of the writer." *James v. Gannett Co.*, 353 N.E.2d 834, 838 (N.Y. 1976); *accord, e.g.*, *Chau v. Lewis*, 935 F. Supp. 2d 644, 665 (S.D.N.Y. 2013).

In general the trial court should view allegedly defamatory statements from the perspective of the average member of the public. Statements directed to a specific audience, however, are considered from the viewpoint of that audience. Instructive is this Court's analysis of the perspective from which it should assess an allegedly defamatory article on boxing published to sports readers:

> The issue of how the "average reader" would construe the statements is certainly a fair one, for the question of whether statements are defamatory turns on *how the audience to whom the statements are addressed* would interpret them. . . . As the New York State Court of Appeals has explained in [a] boxing-defamation case[]: . . . . "The words are to be construed not with the close precision expected from lawyers and judges but as they would be read and understood by the public to which they are addressed. . . ."
>
> Here, the statements in question were addressed to readers of an Internet boxing website and the sports pages of daily newspapers. The statements must be considered from their viewpoint. As Judge Martin . . . held [in *Horne v. Matthews*, No. 97 Civ. 3605(JSM), 1997 WL 598452 (S.D.N.Y. Sept. 25, 1997)]: "An article on the sports page of a newspaper should be viewed *from the perspective of the audience to whom it is addressed*, *i.e.*, *the understanding of "a sophisticated and sports-conscious reader.*"

Dibella v. Hopkins, No. 01 CIV. 11779 (DC), 2002 WL 31427362, at *2 (S.D.N.Y. Oct. 30, 2002) (emphasis supplied; citation omitted).

The entirety of the email containing the January 2015 statement from Mr. Gow sent to various media representatives reads:

> To Whom It May Concern,
> Please find attached a quotable statement on behalf of Ms Maxwell.
>
> No further communication will be provided by her on this matter.
> Thanks for your understanding.
> Best
> Ross
>
> Ross Gow
> ACUITY Reputation

> Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts [sic] <u>against Ghislaine Maxwell are untrue.</u> The original allegations are not new and have been fully responded to and <u>shown to be untrue</u>.
>
> Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and *now* it is alleged by Ms Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.
>
> Ms Roberts <u>claims are obvious lies</u> and should be treated as such and not publicised as news, as they are defamatory.
>
> Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

EXHIBIT F (italics and underscoring supplied).

Plaintiff listed the underscored clauses/phrases in the Complaint as the "deliberate falsehoods," Doc.1 ¶ 30, and "false and defamatory statements," *id.* ¶ 32, plaintiff is suing on.[15] As discussed above, it is improper to remove from their context and isolate allegedly defamatory words, phrases and clauses of sentences from an allegedly defamatory publication. Instead, the allegedly defamatory words, phrases and clauses must be (a) "construed in the context of the entire statement or publication as a whole";[16] (b) considered "from the whole scope and apparent object of the writer";[17] and (c) "viewed from the perspective of the audience to whom it is addressed."[18]

The statement was directed at a discrete number of—some 30—members of the media in reply to their request for a response from Ms. Maxwell to Ms. Giuffre's CVRA joinder motion.

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[15] Plaintiff also alleges that Ms. Maxwell slandered her on January 4, 2015, when responding to a question posed to her while she was on a Manhattan street. Doc.1 ¶ 37. This allegedly defamatory statement is addressed in Argument IV, below.

[16] *Aronson*, 483 N.E.2d at 1139.

[17] *James*, 353 N.E.2d at 838.

[18] *Dibella*, 2002 WL 31427362, at *2.

Mr. Barden, who prepared the January 2015 statement, did not intend the January 2015 statement to be a traditional press release solely to disseminate information to the media. EXHIBIT K ¶ 15. So he did not request that Mr. Gow or any other public relations specialist prepare the statement. *Id.* Instead, Mr. Gow served only as Mr. Barden's conduit to the media representatives who had requested a response to the joinder motion allegations and who Mr. Barden believed might republish those allegations. *Id.*

Mr. Barden intended the statement to mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. *Id.* ¶ 16. He believed this could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. *Id.* For example, he noted that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news." *Id.*

Mr. Barden also intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. *Id.* ¶ 17. So Mr. Barden stated repeatedly that plaintiff's allegations were "defamatory." *Id.* In this sense, the statement was very much intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct. *Id.*

Consistent with Mr. Barden's purposes for the statement, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a *quotable statement* on behalf of Ms Maxwell" (emphasis supplied). *Id.* ¶ 19. The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to plaintiff's December 30, 2014,

allegations that would give the media Ms. Maxwell's response. *Id.* The purpose of the prefatory statement was to inform the media-recipients of this intent. *Id.*

We note that plaintiff in her Complaint makes the same mistake as the *Steinhilber* plaintiff—extracting words and phrases from their opinion context so that she can claim the assertion of a "defamatory" fact. *See* Doc.1 ¶ 30. That is not permissible. *See Steinhilber*, 501 N.E.2d at 555 ("The sentence which plaintiff selects from the message and claims is "factually laden"—impugning her as lacking in "talent, ambition, and initiative"[5]—is preceded and followed by statements which are clearly part of the attempt at humor prevailing throughout . . . .").

The broader social context or setting surrounding the communication, including the existence of any applicable customs or conventions which might signal to readers that what is being read is likely to be opinion, not fact. This factor is concerned with "the factual background" leading up to the preparation of the statement. It is a critical factor here. In December 2014, plaintiff and her lawyers had timed for maximum effect—during the slow news cycle between Christmas and New Year's Day—the public filing of a superfluous motion filled with salacious and provocative allegations of "sexual abuse" and "sexual trafficking" involving wealthy and prominent Americans. Plaintiff deliberately placed Ms. Maxwell in the middle of the abuse and trafficking, alleging that she recruited plaintiff into the sexual abuse/trafficking scheme and engaged in numerous criminal acts.

Importantly, three years earlier when plaintiff was interviewed extensively by Churcher for two lengthy articles published in March 2011, plaintiff's allegations concerning Ms. Maxwell were very much different. In the articles discussing plaintiff's "shocking account"[19] of being

[19] EXHIBIT A, at 2.

sexually exploited by Epstein, Prince Andrew and Epstein's "male peers,"[20] plaintiff made virtually *none* of what Judge Marra found were "unnecessary"[21] and "lurid details"[22] about how Ms. Maxwell allegedly had subjected her to sexual abuse and trafficking.

After plaintiff filed the CVRA motion, some thirty reporters contacted Ms. Maxwell's press representative, Mr. Gow, for Ms. Maxwell's response. As Ms. Maxwell's lawyer, Mr. Barden undertook that task. Relying on his knowledge of the 2011 articles publishing plaintiff's allegations and drawing on his experience and training as a lawyer, Mr. Barden crafted a response with the goal of discrediting plaintiff and what the statement called plaintiff's "new" allegations. To that end Mr. Barden contrasted plaintiff's "old" allegations from 2011 with the "new" 2014 allegations. The second paragraph of the statement is indicative of this strategy: "*Each time the story is re told [sic] it changes* with *new salacious details* about public figures and world leaders and *now* it is alleged by [Ms. Giuffre] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies." EXHIBIT F (emphasis supplied). Having established the dramatic difference between these sets of allegations suggesting plaintiff was fabricating more and more-salacious allegations as she had more time to manufacture them, Mr. Barden added the third paragraph: "[Ms. Giuffre's] claims are *obvious lies* and should be treated as such and not publicised as news, as they are defamatory." *Id.* (emphasis supplied).

Mr. Barden's arguments constitute "pure opinion," *Steinhilber*, 501 N.E.2d at 552. They take established and revealed facts—plaintiff's modest 2011 allegations to a newspaper reporter and plaintiff's expansive, unnecessary and lurid 2014 allegations in a motion to open the door to

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[20] *Id.*

[21] EXHIBIT E, at 5.

[22] *Id.*

criminal prosecutions of (and civil lawsuits against) wealthy and prominent men around the world—to draw an obvious inference that plaintiff was (more) truthful in the 2011 articles and engaged in massive manufacturing of fiction in the 2014 joinder motion. There is no limit to the subject matters on which pure opinions may be expressed with constitutional immunity, including whether a person believes another is "lying" or is a "liar." *See, e.g.*, *Indep. Living Aids, Inc. v. Maxi-Aids, Inc.*, 981 F. Supp. 124, 128 (E.D.N.Y. 1997) (granting summary judgment: "Read in the context of the entire article, Zaretsky's remarks, calling Sandler and others 'liars,' can only be understood as a denial of their accusations. . . . Even the most careless reader must have perceived that the words were no more than rhetorical hyperbole, a vigorous epithet used by Zaretsky who considered himself unfairly treated and sought to bring what he alleged were the true facts to the readers. The epithet 'liar' in this context, standing by itself, merely expressed the opinion that anyone who persisted in accusing Zaretsky of improper business practices could not be telling the truth. Since the basis for this opinion was fully set forth, the communication of Zaretsky's views cannot be libelous.") (citations, ellipsis, brackets and internal quotations omitted); *see Gross v. New York Times*, 623 N.E.2d 1163, 1169 (N.Y. 1993) ("[E]ven when uttered or published in a . . . serious tone, accusations of criminality could be regarded as mere hypothesis and therefore not actionable if the facts on which they are based are fully and accurately set forth and it is clear to the reasonable reader . . . that the accusation is merely a personal surmise built upon those facts. In all cases, whether the challenged remark concerns criminality or some other defamatory category, the courts are obliged to consider the communication as a whole, as well as its immediate and broader social contexts, to determine whether the reasonable listener . . . is likely to understand the remark as an assertion of provable fact.").

Mr. Barden's inference from disclosed facts qualifies as "pure opinion," *Steinhilber*, 501 N.E.2d at 552. Accordingly, that Mr. Barden characterized plaintiff's 2014 allegations harshly as "obvious lies" as opposed to "untruths" or some softer term is of no moment. "[U]nder New York law, pure opinion . . . is not actionable because expressions of opinion, as opposed to assertions of fact, are deemed privileged and, no matter how offensive, cannot be the subject of an action for defamation." *Ratajack v. Brewster Fire Dep't, Inc. of the Brewster-SE Joint Fire Dist.*, 178 F. Supp. 3d 118, 158 (S.D.N.Y. 2016) (internal quotations and ellipsis omitted; brackets altered); *accord, e.g.*, *Mann v. Abel*, 885 N.E.2d 884, 885-86 (N.Y. 2008).

The drawing of such inferences would be constitutionally protected even under the standards of the First Amendment that are less protective of opinion than is Article I, Section 8, of the New York Constitution. *See Adelson v. Harris*, 973 F. Supp. 2d 467, 490 (S.D.N.Y. 2013) ("In determining whether a statement constitutes constitutionally protected opinion, courts also look to the specific context of the statement. When looking at a statement's specific context, of particular importance is the principle that when an author outlines the facts available to him, thus making it clear that the challenged statements represent his own interpretation of those facts and leaving the reader free to draw his own conclusions, those statements are generally protected by the First Amendment.") (internal quotations and brackets omitted).

The application of the four *Steinhilber* factors confirms that the three phrases and/or clauses plaintiff alleges are defamatory are in fact part of a statement that taken as a whole constitutes nonactionable opinion. The premise of plaintiff's Complaint is that once she is able to identify references in the January 2015 statement to any assertion of fact that potentially is subject to proof, e.g., the truth or falsity of her many dozens of allegations old and new, then she has a viable defamation claim. That ignores the teaching of *Steinhilber* and *Immuno AG*. As the

Steinhilber court held, "even apparent statements of fact may assume the character of statements of opinion, and thus be privileged, when made in public debate, heated labor dispute, or other circumstances in which an audience may anticipate the use of epithets, fiery rhetoric or hyperbole." *Id.* (internal quotations and brackets omitted); *see Gross*, 623 N.E.2d at 1169 ("we stress once again our commitment to avoiding the 'hypertechnical parsing' of written and spoken words for the purpose of identifying 'possible "fact[s]"' that might form the basis of sustainable libel action") (quoting *Immuno AG*, 567 N.E.2d at 1282).

To the same effect is this Court's citation to a Louisiana Supreme Court decision for the proposition that "'[w]ords which, taken by themselves, would appear to be a positive allegation of fact, *may be shown by the context to be a mere expression of opinion or <u>argumentative</u> influence*.'" *Adelson*, 973 F. Supp. 2d at 488 (emphasis supplied; quoting *Mashburn v. Collin*, 355 So. 2d 879, 885 (La. 1977)).

It also is important to take into account, as *Steinhilber* requires, that Mr. Barden was directing the January 2015 statement to a discrete number of media representatives who were aware of plaintiff's "original" and "new," joinder-motion allegations and who were requesting a response from Ms. Maxwell to the "new" allegations. These newspaper reporters and other media representatives would have the point Mr. Barden was making—the opinion he was expressing—namely, that there was good reason to believe plaintiff was fabricating allegations for her purposes. In the context of the media circus that ensued the public filing of the joinder motion and the media's repeated and insistent requests for an immediate response from Ms. Maxwell, it is highly unlikely any media-recipients of the January 2015 statement expected anything other than a statement equivalent to the March 2011 statement condemning the allegations; and it is highly likely all the media-recipients understood the statement to be a

forceful argument that plaintiff's shifting and inconsistent stories about what allegedly happened rendered her inherently unbelievable and proved her increasingly provocative and lurid allegations were "obvious lies." These are precisely the messages Mr. Barden sent to them.

The general nature of Mr. Barden's assertions ("allegations," "original allegations," "claims"), the distinction between plaintiff's "original" and "new" allegations, and the inferences he drew from comparing the "original" and "new" allegations—together—powerfully demonstrate that the January 2015 statement was nothing more than opinion.

B. In this Rule 56 proceeding, this Court's Rule 12(b)(6) opinion does not control the question of law whether the January 2015 statement constitutes nonactionable opinion.

In its Rule 12(b)(6) opinion the Court, relying on *Davis v. Boeheim*, 22 N.E.3d 999 (2014), ruled that the three allegedly defamatory statements in the January 2015 statement (*see* Doc.1 ¶ 30(a)-(c)) have a specific and readily understood factual meaning, are capable of being proven true or false, and "clearly constitute fact to the reader." Doc.37 at 9. We respectfully suggest the Court's Rule 12(b)(6) decision does not control in this Rule 56 proceeding.

To begin with, the standards for deciding a Rule 12(b)(6) motion are substantially different from the standards for deciding a Rule 56 motion. As the Court noted, in deciding a 12(b)(6) motion the court must accept as true the factual allegations and draw all inferences in the plaintiff's favor; a plaintiff need only state a claim that is "plausible on its face." *Id.* at 3 (internal quotations omitted). In contrast, in deciding a Rule 56 motion the plaintiff defending the motion may *not* "rest on [the] allegations" in her complaint. *Anderson*, 477 U.S. at 249. The difference in the standards is crucial here.

As this Court recognized, "'[t]he dispositive inquiry'" for purposes of deciding whether an allegedly defamatory statement is fact or nonactionable opinion is whether "'a reasonable reader could have concluded that the statements were conveying facts about the plaintiff.'"

Doc.37 at 7 (quoting *Davis*, 22 N.E.3d at 1005). To answer that inquiry, the Court applied the three factors enumerated in *Davis*. *See id.* These three factors are the same as the four factors in *Immuno AG*; the difference is that the *Davis* court collapsed the *Immuno AG*'s third and fourth factors into one. *See Davis*, 22 N.E.3d at 1005.

As framed by the *Davis* court, the third factor is "whether either the *full context of the communication* in which the statement appears or the *broader social context and surrounding circumstances* are such as to signal . . . readers or listeners that what is being read or heard is likely to be opinion, not fact." *Id.* (internal quotations omitted; emphasis supplied), *quoted in* Doc.37 at 7. Although this Court did not note this in its opinion, this third factor "is often *the key consideration* in categorizing a statement as fact or opinion." *Id.* at 1006 (emphasis supplied).

As in *Davis*, which also was decided on a Rule 12(b)(6) motion,[23] this Court when considering the third factor did not have the benefit of any of the evidence presented in this motion. That is to say, the Court did not have the "full context of the" July 2015 statement or the "broader social context and surrounding circumstances" of the statement, since none of the evidence presented in this Motion was pleaded in the Complaint.

Nor, in the context of the 12(b)(6) motion, did the Court consider that the relevant "readers" of the July 2015 statement were not the "average reader"[24] in the general public, but a "cynical"[25] and "sophisticated"[26] group of about 30 reporters and journalists who were knowledgeable about plaintiff's allegations of being the victim of sexual abuse and sexual

[23] *Davis*, 22 N.E.3d at 1001.

[24] *Aronson*, 483 N.E.2d at 1139.

[25] Steven Shiffrin, *The Politics of the Mass Media and the Free Speech Principle*, 69 Ind. L.J. 689, 702 (1994).

[26] *Dibella*, 2002 WL 31427362, at *2.

trafficking. Viewing the July 2015 statement from the perspective of these reporters and journalists—the only persons who received the July 2015 statement—presents a different landscape in the "fact versus opinion" analysis.

Applying the third factor with the benefit of the Rule 56 records compels a conclusion different from the one this Court reached on the barren Rule 12(b)(6) record. For example, this Court did not consider that the media-recipients of the July 2015 statement would have understood the statement in precisely the way Mr. Barden intended: Based on a comparison of dramatic differences between her "original" and "new" allegations, Ms. Giuffre is a teller of falsehoods—is a liar—and cannot be trusted, and her new CVRA joint-motion allegations, which deviated so substantially from her originally allegations, are falsehoods—proven false by her increasingly provocative and lurid versions of her story of "victimhood." *See generally* Exhibit J.

III. The pre-litigation privilege bars this action.

Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction[27]) before the commencement of litigation are privileged and "no cause of action for defamation can be based on those statements," *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015). So long as there was "a good faith basis to anticipate litigation," a statement concerning either "actual litigation or prelitigation matters" is subject to an "*absolute privilege*." *Flomenhaft v. Finkelstein*, 8 N.Y.S.3d 161, 164 n.2 (App. Div. 2015) (emphasis supplied); *accord Kirk v. Heppt*, 532 F. Supp. 2d 586, 593 (S.D.N.Y. 2008).

The privilege covers statements made in connection with "pending or "*contemplated* litigation." *Goldstein v. Cogswell*, No. 85 CIV. 9256 (KMW), 1992 WL 131723, at *27 n.32 (S.D.N.Y. June 1, 1992) It covers statements made outside court, including in written

[27] *See Chambers v. Wells Fargo Bank, N.A.*, No. 2016 WL 3533998, at *8 (D.N.J. June 28, 2016); *see generally Hawkins v. Harris*, 661 A.2d 284, 289-91 (N.J. 1995).

communications "between litigating parties or their attorneys." *Klein v. McGauley*, 29. A.D.2d 418, 420 (N.Y. App. Div. 1968), *cited with approval in Petrus v. Smith*, 91 A.D.2d 1190, 1191 (N.Y. App. App. Div. 1983). It covers "cease and desist letters." *Khalil*, 28 N.E.3d at 19. And it covers "all pertinent communications among the parties, counsel, witnesses and the court," regardless "[w]hether a statement was made in or out of court, was on or off the record, or was made orally or in writing." *Frechtman v. Gutterrnan*, 979 N.Y.S. 2d 58 (App. Div. 2014) (quoting *Sexter v. Warmflash, P.C. v. Margrabe*, 828 N.Y.S. 2d 315 (App. Div. 2007)).

When the pre-litigation privilege is invoked in connection with an allegedly defamatory statement made during pending or contemplated litigation, "any doubts are to be resolved in favor of pertinence." *Flomenhaft*, 8 N.Y.S.3d at 164. "[T]he test to determine whether a statement is pertinent to litigation is '"extremely liberal,"' such that the offending statement, to be actionable, must have been '*outrageously out of context*.'" *Id.* at 164-65 (emphasis supplied; quoting *Black v. Green Harbour Homeowners' Ass'n*, 798 N.Y.S.2d 753 (App. Div. 2005), and *Martirano v. Frost*, 255 N.E.2d 693 (1969)); *Kirk*, 532 F. Supp. 2d at 593.

In denying Ms. Maxwell's motion to dismiss the Complaint based on the pre-litigation privilege, this Court limited its analysis of the privilege to whether under the Rule 12(b)(6) standard plaintiff had sufficiently pleaded that the January 2 and 4 statements were made with actual malice. Doc.37 at 18-19. The Court's Rule 12(b)(6) analysis does not bear on the question presented here, for two reasons.

Under the "substantive law"[28] actual malice is not relevant to the pre-litigation defense. The New York Court of Appeals in *Khalil* held that to prevail on the pre-litigation privilege the defendant need only establish <u>*one element*</u>: the allegedly defamatory statement at issue was

[28] *Anderson*, 477 U.S. at 248.

"pertinent to a good faith anticipated litigation." 28 N.E.3d at 16. Upon establishing that element, summary judgment for the defendant is required. *See id.* Additionally, this is a summary judgment proceeding. Plaintiff cannot rely on the allegations of her Complaint. Evidence is required.

The following evidence is not in dispute. By January 2015 Ms. Maxwell had retained British Solicitor Philip Barden to represent and advise her in connection with plaintiff's publication in the British press of salacious, defamatory allegations of criminal sexual abuse during the period 1999-2002. EXHIBIT K ¶¶ 8-10. Mr. Barden in turn engaged UK press agent Ross Gow. *Id.* ¶ 9. Mr. Barden prepared the January 2015 statement and instructed Mr. Gow to transmit it via email to members of the UK media who had made inquiry about the allegations in the joinder motion. *Id.* ¶ 10.

Mr. Barden did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media. *Id.* ¶ 15. This is why he intentionally did not request that Mr. Gow or any other public relations specialist prepare the statement. *Id.* Instead, Mr. Gow served as his conduit to the media representatives who had requested a response to the joinder motion allegations and who Mr. Barden believed might republish those allegations. *Id.*

Mr. Barden had two purposes in preparing and causing the statement to be disseminated to those media representatives. First, he wanted to mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. *Id.* ¶ 16. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. *Id.* For example, he noted in the January 2015 statement that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news." *Id.*

Second, Mr. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. *Id.* ¶ 17. This was the purpose of repeatedly stating that plaintiff's allegations were "defamatory." *Id.* The statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct. *Id.*

At the time Mr. Barden directed the issuance of the statement, he was contemplating litigation against the media-recipients as an additional means to mitigate and prevent harm to Ms. Maxwell. *Id.* ¶ 28. Toward this end, he prepared the statement so that it made clear Ms. Maxwell "strongly denie[d] the allegations of an unsavoury nature," declared the republications of the allegations to be false, gave the press-recipients notice that the republications of the allegations "are defamatory," and informed them that Ms. Maxwell was "reserv[ing] her right to seek redress." *Id.* ¶ 30. In any such UK defamation, or other related, action Ms. Giuffre would be a defendant or a witness. *Id.* ¶ 29.

The question presented is whether Mr. Barden's statement, which he directed to be sent to various media representatives, is "pertinent to a good faith anticipated litigation," *Khalil*, 28 N.E.3d at 16.

The requirement of "good faith" anticipated litigation is intended to prevent attorneys (or their agents) from "bully[ing], harass[ing], or intimidat[ing] their client's adversaries by threatening baseless litigation or by asserting unmeritorious claims, unsupported in law and fact, in violation of counsel's ethical obligations," *id.* at 19. The statement Mr. Barden prepared and caused to be issued was not intended to bully, harass or intimidate the press-recipients, i.e., the

potential defendants in an action by Ms. Maxwell for defamation. *See* EXHIBIT K ¶¶ 26-30. Nothing about the statement on its face suggested bullying, harassing or intimidating the press-recipients (or anyone else). At the time Mr. Barden directed the issuance of the statement, he had sufficient factual and legal grounds to pursue in good faith a defamation action against one or more of the press-recipients for republishing plaintiff's allegations. *See generally id.* ¶¶ 8-30.

That the statement was directed at the press-recipients—which had republished plaintiff's false allegations and was not directed at plaintiff—is irrelevant to the absolute privilege protecting pre-litigation communications. In *International Publishing Concepts, LLC v. Locatelli*, letters and emails detailing likely litigation and an intent to sue were extended the same pre-litigation privilege although sent to two non-parties who were only potentially affected by the litigation or witnesses to it. *See also Kirk*, 532 F. Supp. 2d at 593 ("The privilege is broad, and embraces anything that may possibly or plausibly be relevant to the litigation.") (internal quotations omitted).

The only issue remaining is whether the statement was pertinent to the contemplated litigation. Applying the "extremely liberal" test of pertinence, in which "any doubts are to be resolved in favor of pertinence,"[29] the court must decide whether the allegedly defamatory statement is "outrageously out of context" in relation to the contemplated litigation. *Flomenhaft*, 8 N.Y.S.3d at 164-65 (internal quotations omitted). Nothing in the statement is "outrageously out of context." Every statement was directly related to the press-recipients' republication of plaintiff's false allegations against Ms. Maxwell.

The January 4 statement also is absolutely privileged. According to plaintiff, Ms. Maxwell told a reporter on that date when asked to comment on plaintiff's joinder-motion

[29] *Flomenhaft*, 8 N.Y.S.3d at 164 (internal quotations omitted).

allegations: "I am referring to the statement that was made." Doc.1 ¶ 32. Assuming *arguendo* the statement is defamatory,[30] it is absolutely privileged since it simply refers to an absolutely privileged statement. *See, e.g., Klein*, 29 A.D.2d at 420 (privilege protects communications "between litigating parties"); *Frechtman*, 979 N.Y.S.2d at 63 (privilege protects communications "made in or out of court, … on or off the record, … orally or in writing") (internal quotations omitted).

Under these circumstances the pre-litigation privilege is absolute and "no cause of action for defamation can be based on those statements," *Khalil*, 28 N.E.3d at 16. The Court should enter summary judgment on plaintiff's defamation claim.

IV. Ms. Maxwell's January 4, 2015, statement is nonactionable.

Plaintiff alleges that on January 4, 2015, a reporter approached Ms. Maxwell on a public street in Manhattan and "asked Maxwell about Giuffre's allegations against Maxwell." Doc.1 ¶ 37. Plaintiff alleges that Ms. Maxwell responded with a single sentence: "'I am referring to the statement that we made.'" *Id.* According to plaintiff, Ms. Maxwell's statement was defamatory. *See id.* ¶ 37 & Count I ¶ 5, at 8. Judgment should enter against plaintiff as to Ms. Maxwell's statement.

Adelson controls this portion of plaintiff's defamation claim. In *Adelson* a non-profit organization during the 2012 presidential campaign published a statement on its website critical of Sheldon Adelson, a wealthy Republican donor. The statement alleged Adelson had donated "tainted" and "dirty" money to Governor Romney. Eight days later the organization withdrew the statement from its website. On the same day it issued a press release explaining that although

[30] As discussed in Argument IV, the January 4 statement is nonactionable.

it took down the statement, "we stand by everything we said, which was sourced from current, credible news accounts." 973 F. Supp. 2d at 474.

Adelson sued. He alleged that the statement was defamatory and that the press release constituted a republication of the defamatory statement. This court held that the statement contained only constitutionally protected opinion and was nonactionable. The court then rejected the defamation claim based on republication: "'[A] mere reference to another writing that contains defamatory matter does not constitute an actionable repetition or republication." *Id.* (quoting *Goforth v. Avemco Life Ins. Co.*, 368 F.2d 25, 28 n.7 (4th Cir.1966)). This is the settled rule. *See In re Philadelphia Newspapers*, LLC, 690 F.3d 161, 175 (3d Cir. 2012), *as corrected* (Oct. 25, 2012) ("under traditional principles of republication, a mere reference to an article, regardless how favorable it is as long as it does not restate the defamatory material, does not republish the material"); *Salyer v. S. Poverty Law Ctr., Inc.*, 701 F. Supp. 2d 912, 916 (W.D. Ky. 2009) ("[T]he common thread of traditional republication is that it presents the material, in its entirety, before a new audience. A mere reference to a previously published article does not do that.").

Ms. Maxwell's one-sentence response that merely referenced an earlier statement is nonactionable. This Court should enter partial summary judgment on the defamation claim to the extent it is based on Ms. Maxwell's response.

V. The defamation claim should be dismissed because the publication is substantially true.

"'[A] statement is substantially true if the statement would not "have a different effect on the mind of the reader from that which the pleaded truth would have produced."'" *Franklin v. Daily Holdings, Inc.*, 21 N.Y.S.3d 6, 12 (App. Div. 2015) (quoting *Biro v. Condé Nast*, 883 F. Supp. 2d 441, 458 (S.D.N.Y. 2012) (quoting *Jewell v. NYP Holdings, Inc.*, 23 F. Supp. 2d 348,

366 (S.D.N.Y.1998) (quoting *Fleckenstein v. Friedman*, 193 N.E. 537, 538 (1934)))). Indeed, it is well settled in New York "that an alleged libel is not actionable if the published statement could have produced no worse an effect on the mind of a reader than the truth pertinent to the allegation." *Id.* (internal quotations omitted). "When the truth is so near to the facts as published that fine and shaded distinctions must be drawn and words pressed out of their ordinary usage to sustain a charge of libel, no legal harm has been done." *Fleckenstein*, 193 N.E. at 538.

For the reasons articulated in Argument VI, the January 2015 statement is substantially true as matter of law.

VI. Plaintiff cannot establish actual malice by clear and convincing evidence.

A. Facts.

The following numbered facts are not in dispute and are sequentially numbered following the undisputed facts cited earlier. *See* This Motion at ¶¶ 1-36.

37. **Plaintiff lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell.** After leaving the Growing Together drug rehabilitation facility in 1999, plaintiff moved in with the family of a fellow patient. EXHIBIT L at 7-8, 12-14. There she met, and became engaged to, her friend's brother, James Michael Austrich. *Id.* & at 19. She and Austrich thereafter rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. *Id.* at 11, 13-17. Later, they stayed briefly with plaintiff's parents in the Palm Beach/Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. *Id.* at 17, 19, 25-27; EXHIBIT M. Although plaintiff agreed to marry Austrich, she never had any intention of doing so. EXHIBIT N at 127-128.

38. **Plaintiff re-enrolled in high school from June 21, 2000 until March 7, 2002**. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, plaintiff re-

enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. EXHIBIT O. On September 20, 2001, Plaintiff then enrolled at Royal Palm Beach High School. *Id.* A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. *Id.* Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. EXHIBIT P at 23-24. Plaintiff remained enrolled at Survivor's Charter School until March 7, 2002. EXHIBIT O. She was present 56 days and absent 13 days during her time there. *Id.* Plaintiff never received her high school diploma or GED. EXHIBIT Q at 475, 483. Plaintiff and Figueroa went "back to school" together at Survivor's Charter School. EXHIBIT P at 23-27. The school day there lasted from morning until early afternoon. *Id.* at 23-27, 144-46.

39. During the year 2000, plaintiff worked at numerous jobs. In 2000, while living with her fiancé, plaintiff held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. EXHIBIT R. Her taxable earnings that year totaled nearly $9,000. *Id.* Plaintiff cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs. EXHIBIT Q at 470-471.

40. Plaintiff's employment at the Mar-a-Lago spa began in fall 2000. Plaintiff's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. EXHIBIT S. Mr. Roberts worked there year-round for approximately 3 years. *Id.*; EXHIBIT T at 72-73. After working there for a period of time, Mr. Roberts became acquainted with the head of the spa area and recommended plaintiff for a job there. *Id.* at 72. Mar-a-Lago closes every Mother's Day and reopens on November 1. EXHIBIT U at Mar-a-Lago0212. Most of employees Mar-a-Lago, including all employees of the spa area

such as "spa attendants," are "seasonal" and work only when the club is open, i.e., between November 1 and Mother's Day. EXHIBIT T at 72-73; EXHIBIT U at MAR-A-LAGO 0212; EXHIBIT V. Plaintiff was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

41. **Plaintiff represented herself as a masseuse for Jeffrey Epstein.** While working at the Mar-a-Lago spa and reading a library book about massage, plaintiff met Ms. Maxwell. Plaintiff thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. EXHIBIT T at 79. Plaintiff's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. *Id.* at 82-83. Plaintiff commenced employment as a traveling masseuse for Mr. Epstein. Plaintiff was excited about her job as a masseuse, about traveling with him and about meeting famous people. EXHIBIT L at 56; EXHIBIT P at 126. Plaintiff represented that she was employed as a masseuse beginning in January 2001. EXHIBIT M; EXHIBIT N. Plaintiff never mentioned Ms. Maxwell to her then-fiancé, Austrich. EXHIBIT L at 74. Plaintiff's father never met Ms. Maxwell. EXHIBIT T at 85.

42. **Plaintiff resumed her relationship with convicted felon Anthony Figueroa.** In spring 2001, while living with Austich, plaintiff lied to and cheated on him with her high school boyfriend, Anthony Figueroa. EXHIBIT L at 68, 72. Plaintiff and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with plaintiff. EXHIBIT L at 20; EXHIBIT P at 28. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Plaintiff's presence punched Austrich in the face. EXHIBIT X; EXHIBIT L at 38-45. Figueroa and plaintiff fled the scene before police arrived. EXHIBIT X. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance. EXHIBIT Y.

43. **Plaintiff freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, plaintiff and Figueroa hosted a party with a number of guests. EXHIBIT Z. During the party, according to plaintiff, someone entered plaintiff's room and stole $500 from her shirt pocket. *Id.* Plaintiff contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, plaintiff contacted the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. EXHIBIT AA. Again, plaintiff met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave." *Id.*

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Plaintiff.** Flight logs maintained by Epstein's private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Plaintiff, between August 2001 and September 2002. EXHIBIT BB. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. EXHIBIT CC at 6-15. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. *Id.* at 99-100, 103. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Plaintiff lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Plaintiff. EXHIBIT BB. During this same period of time, Plaintiff was employed at various jobs, enrolled in school, and living with her boyfriend.

45. **Plaintiff and Figueroa shared a vehicle during 2001 and 2002.** Plaintiff and Figueroa shared a '93 white Pontiac in 2001 and 2002. EXHIBIT P at 67; EXHIBIT EE. Plaintiff freely traveled around the Palm Beach area in that vehicle. *Id.* In August 2002, Plaintiff acquired a Dodge Dakota pickup truck from her father. EXHIBIT P at 67-68. Figueroa used that vehicle in a series of crimes before and after Plaintiff left for Thailand. *Id.;* EXHIBIT FF.

46. **Plaintiff held a number of jobs in 2001 and 2002**. During 2001 and 2002, plaintiff was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. EXHIBIT R. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM). *Id.*; EXHIBIT W.

47. **In September 2002, Plaintiff traveled to Thailand to receive massage training and while there, met her future husband and eloped with him.** Plaintiff traveled to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of $4,000. EXHIBIT P at 35. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016. *Id.* at 29, 37.

48. **Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography.** Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. EXHIBIT GG at 10. That investigation commenced in 2005. *Id.* Recarey worked only on the Epstein case for an entire year. *Id.* at 274. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein

home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. *Id.* at 212-15. Detective Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. *Id.* at 10-11, 177, 180-82, 187-96, 241-42, 278. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. *Id.* Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. *Id.* Maxwell was not seen coming or going from the house during the law enforcement surveillance of Epstein's home. *Id.* at 214-215. The arrest warrant did not mention Ms. Maxwell and her name was never mentioned before the grand jury. *Id.* at 203, 211. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. *Id.* at 257. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." *Id.* at 278. He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. *Id.* at 278-79. Detective Recarey also has no knowledge of Plaintiff's conduct that is subject of this lawsuit. *Id.* at 259-60.

49. **No nude photograph of Plaintiff was displayed in Epstein's home.** Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia Roberts in Mr. Epstein's house." EXHIBIT HH at ¶ 17. Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office. EXHIBIT GG at 289-90.

50. **Plaintiff intentionally destroyed her "journal" and "dream journal" regarding her "memories" of this case in 2013 while represented by counsel.** Plaintiff drafted a "journal" describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. EXHIBIT II at 64-65, 194; EXHIBIT N at 205-08. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. *Id.* Plaintiff also kept a "dream journal" regarding her thoughts and memories that she possessed in January 2016. EXHIBIT II at 194-96. To date, Plaintiff cannot locate the "dream journal." *Id.*[31]

51. **Plaintiff publicly peddled her story beginning in 2011.** Plaintiff granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with plaintiff and her "attorneys or other agents" from "early 2011" to "the present day." *See* Doc.216 ¶¶ 2-11 and referenced exhibits; Doc.261-1 to 216-8, incorporated by reference. Plaintiff received approximately $160,000 for her stories and pictures that were published by many news organizations. EXHIBIT N at 247-48.

52. **Plaintiff drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish.** In 2011, contemporaneous with her Churcher interviews, plaintiff drafted a book manuscript which purported to document plaintiff's experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. EXHIBIT KK. Plaintiff communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials

[31] Defendant has moved for sanctions against plaintiff premised on her admitted destruction of this evidence. Doc.509-510.

and circulated those along with book chapters to numerous individuals associated with publishing and the media.

53. **Plaintiff's publicly filed "lurid" CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz.** On December 30, 2014, plaintiff, through counsel, publicly filed a joinder motion that contained her "lurid allegations" about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a "corrected" motion (EXHIBIT D) and two further declarations in January and February 2015, which repeated many of plaintiff's claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between plaintiff's lawyers, Edwards and Cassell, and Alan Dershowitz. After plaintiff publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called plaintiff a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations. *See* Doc.363 at 363-1 through 363-14.

54. **Plaintiff formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy.** In 2014, plaintiff, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to plaintiff, the purpose of the organization is to promote plaintiff's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. EXHIBIT LL. Plaintiff attempts to promote Victims Refuse Silence at every opportunity. EXHIBIT MM at 17-18. For example, plaintiff participated

in an interview in New York with ABC to promote the charity and to get her mission out to the public. *Id.* at 28.

B. Plaintiff carries the burden of proving actual malice by clear and convincing evidence.

In *New York Times Co. v. Sullivan*, 376 U.S. 254, 270 (1964), the Supreme Court recognized that our country has made a "profound national commitment to the principle that debate on public issues should be uninhibited, robust, and wide-open." The overriding importance of that commitment led to the Court's holding that "neither factual error nor defamatory content, nor a combination of the two, sufficed to remove the First Amendment shield," *Bartnicki v. Vopper*, 532 U.S. 514, 535 (2001), from speech relating to public officials and public figures. *See, e.g.*, *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 345 (1974). Under the First Amendment of the Constitution and Article I, Section 8, of the New York Constitution, in defamation actions by public officials and public figures and in defamation actions concerning matters of public concern, the plaintiff must prove that the allegedly defamatory statement was made with "actual malice." *See, e.g.*, *id.*; *Philadelphia Newspapers, Inc. v. Hepps*, 475 U.S. 767, 776-77 (1986); *Huggins v. Moore*, 726 N.E.2d 456, 460 (N.Y. 1999); *McGill v. Parker*, 582 N.Y.S.2d 91, 97 (App. Div. 1992).

As the Supreme Court has noted, the term "actual malice" can be confusing because in the First Amendment context "it has nothing to do with bad motive or ill will." *Harte-Hanks Communic'ns, Inc. v. Connaughton*, 491 U.S. 657, 666 n.7 (1989). Instead proof of actual malice requires evidence that the publication contains a "material"[32] false statement of fact that was made "with knowledge that the statement was false or with reckless disregard as to whether or

[32] *Air Wisconsin Airlines Corp. v. Hoeper*, 134 S. Ct. 852, 861 (2014) ("minor inaccuracies do not amount to falsity so long as 'the substance, the gist, the sting, of the libelous charge be justified") (internal quotations and brackets omitted).

not it was true." *Id.* at 667 (internal quotations omitted). Reckless disregard means the defendant made the false publication "with a high degree of awareness of probable falsity" or "entertained serious doubts as to the truth of [the] publication." *Id.* (internal quotations omitted).

In a defamation action, a plaintiff will be required to prove actual malice in two different and independent contexts: a defamation action in which the plaintiff is a public figure, and a defamation action in which the defendant asserts the privilege of reply.

The defamation plaintiff at trial and in summary judgment proceedings must prove her case by clear and convincing evidence.

C. Plaintiff is a public figure who must prove actual malice.

Public figures include those who have "thrust themselves to the forefront of particular public controversies in order to influence the resolution of the issues involved. . . . [T]hey invite attention and comment." *Gertz,* 418 U.S. at 345. The essential element for a finding that a person is a public figure is that she has "taken an affirmative step to attract public attention," has "strived to achieve a measure of public acclaim." *James v. Gannett Co.*, 353 N.E.2d 834, 876 (N.Y. 1976).

In *New York Times Co. v. Sullivan*, 376 U.S. 254 (1964), the United States Supreme Court held that, in cases involving public officials, the interests of an individual are trumped by society's interest in promoting free press discussion of matters of general concern. *Biro v. Condé Naste,* 963 F. Supp. 2d 255, 269 (S.D.N.Y. 2013). Thus, the Court held that a public official alleging defamation must establish that a falsehood has been published with "actual malice." *Sullivan*, 376 U.S. at 279-80; accord, *Lerman v. Flynt Dist. Co*., *Inc.,* 745 F.3d 123, 136 (2d Cir. 1984); *Biro*, 963 F. Supp. 2d at 269. Subsequently, the Supreme Court extended this standard to all public figures*, Curtis Publ'g Co. v. Butts,* 388 U.S. 130 (1967), and decided in *Gertz v. Robert Welch, Inc*., 418 U.S. 323 (1974), that individuals that "are not public figures for all purposes

may still be public figures with respect to a particular controversy." *Contemporary Mission, Inc. v. N.Y. Times Co.*, 842 F.2d 612, 617 (2d Cir. 1988).

As the Second Circuit has observed, the reason for distinguishing between private and public figures in defamation claims flows from the recognition of two things: First, "that private figure are more vulnerable to injury from defamation, because public figures have greater access to the media and thus are in a better position to contradict a lie or correct an error." *Contemporary Mission, Inc*., 842 F.2d at 619-20. Second, "**and more important,** public figures generally 'have voluntarily exposed themselves to increased risk of injury from defamatory falsehood concerning them.'" *Id*. at 620 (quoting *N.Y. Times,* 418 U.S. at 344-45) (emphasis added).

In the Second Circuit, to establish that a plaintiff is a limited purpose public figure, a defendant must prove that she:

1. successfully invited public attention to [her] views in an effort to influence others prior to the incident that is the subject of litigation;
2. voluntarily injected [her]self into a public controversy related to the subject of the litigation;
3. assumed a position of prominence in the public controversy; and
4. maintained regular and continuing access to the media.

Lerman, 745 F.2d at 136-37; *accord*, *Contemporary Mission, Inc*., 842 F.2d at 617; *Biro,* 963 F. Supp. 2d at 270. Statements regarding a limited purpose public figure are subject to enhanced protection only if relevant to the public figure's involvement in a given controversy. *Biro*, 963 F. Supp.2d at 270-71 (citing *Faigin v. Kelly*, 978 F. Supp. 420, 426 (D. N.H. 1997)). "Yet, once a plaintiff is deemed a limited purpose public figure, courts allow the heightened protections to sweep broadly, covering all statements by defendants that are not 'wholly unrelated to the controversy.'" *Biro,* 963 F. Supp. 2d at 271 (quoting *Waldbaum v. Fairchild Publ'ns, Inc*., 626

F.2d 1287, 1298 (D.C. Cir. 1980)). The law requires only that "the statement need be no more than generally related to a dispute in issue to qualify for protection." Robert D. Sack, *Sack on Defamation: Libel, Slander, and Related Problems* ("SACK ON DEFAMATION") § 5:3.3 (4th ed. 2015).

The question whether a plaintiff is a public figure is a question of law for the court to decide. *Celle v. Filipino Reporter Enters. Inc*., 209 F.3d 163, 176-77 (2d Cir. 2000); *accord Biro,* 963 F. Supp. 2d at 270.

1. Plaintiff successfully invited public attention to influence others.

The record amply demonstrates that plaintiff invited public attention to herself and her views regarding the Plaintiff's alleged desire to draw attention to the issue of her purported sex slavery.

Beginning in at least 2011, the Plaintiff met with Sharon Churcher to promote her cause and economic interests. According to Ms. Churcher, the Plaintiff granted Ms. Churcher extensive interviews that resulted in 7 widely distributed articles from March 2011 through January 2015. According to Ms. Churcher, she regularly communicated with the Plaintiff and her "attorneys or other agents" from "early 2011" to "the present day." *See* Doc.216 ¶¶ 2-11 and referenced exhibits; Docs.261-1 to 216-8, incorporated by reference. Plaintiff was amply compensated for this "public attention" and received approximately $160,000 for her stories. and pictures that were published by many news organizations. EXHIBIT N at 247-248. Plaintiff had a contract with the news organizations, The Mail on Sunday.

Plaintiff, in addition to selling this story to the media, again thrust herself into the public's attention when she sought to join the ongoing CVRA litigation against Jeffrey Epstein in the United States District Court in Florida. The Plaintiff, through the same lawyers in this matter, publicly filed a joinder motion that was the equivalent of a press release. The unnecessary and

lurid allegations were ultimately stricken by the Court but accomplished the desired result for the Plaintiff, more public attention. The CVRA pleading created a media frenzy and spawned highly publicized litigation between Plaintiff's lawyers, Edwards and Cassell, and Alan Dershowitz. After the Plaintiff publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called the Plaintiff a liar and accused her lawyers of unethical conduct. In response, the lawyers, Edwards and Cassell, sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations. *See* Doc.363 at 363-1 thorough 363-14 and accompanying exhibits.

In addition, plaintiff claims to have established a non-profit organization, Victims Refuse Silence, the purpose of which was to promote plaintiff's professed cause against sex slavery.

In paragraphs 23 through 26 of her complaint in this matter she makes the following admissions on this issue:

- Ultimately, as a mother and one of Epstein's many victims, Giuffre believed that she should speak out about her sexual abuse experiences in hopes of helping others who had also suffered from sexual trafficking and abuse. *Id.* 23

- On December 23, 2014, Giuffre incorporated an organization called Victims Refuse Silence, Inc., a Florida not-for-profit corporation. *Id.* 24

- Giuffre intended Victims Refuse Silence to change and improve the fight against sexual abuse and human trafficking. The goal of her organization was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Giuffre has now dedicated her professional life to helping victims of sex trafficking. *Id.* 25

- On December 30, 2014, Giuffre moved to join the on-going litigation previously filed by Jane Doe 1 in the Southern District of Florida challenging Epstein's non-prosecution agreement by filing her own joinder motion. *Id.* 26

In sum, the record includes ample evidence of plaintiff's efforts to garner public attention in order to influence others and the success of those efforts.

2. Plaintiff voluntarily injected herself into public controversies related to the subject of this litigation.

The second prong of the *Lerman* test requires an examination of whether plaintiff voluntarily injected herself into a public controversy related to the subject of the litigation. The Second Circuit has held that the term should be defined broadly to mean "any topic upon which sizeable segments of society have different, strongly held views." *Lerman*, 745 F.2d at 138; *see also Biro,* 963 F. Supp. 2d at 272 ("A public controversy is simply 'any topic upon which sizeable segments of society have different, strongly held views,' even if the topic does 'not involve political debate or criticism of public officials.'") (quoting *Lerman*, 745 F.2d at 138) (alteration omitted). The public controversy requirement, however, is not necessarily limited to what would be considered "a classic debate." SACK ON DEFAMATION § 5:3.11[B]. "An investigation into alleged corruption or drug dealing, for example, could meet the test." *Id.*

As demonstrated by the Declaration of Ms. Churcher, the articles attached to the declaration, and the joinder motion filed by plaintiff in the CVRA litigation and the litigation initiated by her lawyers there can be no doubt that the plaintiff's actions were voluntary and that she injected herself into this "public controversy." Indeed, it is clear that plaintiff created this "public controversy."

3. Plaintiff assumed a position of prominence in the public controversies.

The third relevant factor focuses on whether plaintiff has voluntarily assumed a sufficient degree of prominence in the controversies at issue. Plaintiff sold and published her story. She publicly sought to join the CVRA litigation. She established a non-profit organization, the

mission of which is purportedly to “spread the word for victims of human trafficking”. EXHIBIT MM at 17; *see also* EXHIBIT LL.

According to Brittany Henderson, the Rule 30(b)(6) designee of VRS, plaintiff has “continued to try to promote Victims Refuse Silence at every possible chance she gets …” EXHIBIT MM at 17-18. Plaintiff participated in an interview in New York with ABC in “the beginning of 2015,” *id.* at 27, so that she could “promote the charity, so that she could start getting her mission out to the public.” *Id.* at 28. Having affirmatively injected herself into the public spotlight in connection with these issues, plaintiff cannot now be heard to argue that this *Lerman* factor has not been satisfied. *Cf. Contemporary Mission*, 842 F.2d at 618-19 (finding the plaintiffs' assertion that they have assumed a private life was “belied by the fact that they continued to thrust themselves into the public eye” through their conduct on behalf of a non-for-profit organization).

4. Plaintiff has maintained regular and continuing access to the media.

Plaintiff has had substantial access to the media. Ms. Churcher has answered every call or email sent by plaintiff. Plaintiff’s lawyers have regularly communicated with the media. Plaintiff and her lawyers have been interviewed by numerous major media organizations.

Accordingly, the First Amendment requires that public figures like plaintiff claiming defamation must establish actual malice—actual and material falsity or a high degree of awareness of probable falsity—by clear and convincing evidence. *E.g.*, *Masson v. New Yorker Magazine, Inc.*, 501 U.S. 496, 510 (1991).

D. Plaintiff must also prove actual malice to overcome the defenses of reply and pre-litigation privilege.

The qualified privilege of reply to a defamatory attack is a complete defense to a claim of defamation. *Shenkman v. O’Malley*, 157 N.Y.S.2d 290, 294, 297 (App. Div. 1956). The defense

is available to a person "who has been defamed in the first instance," here, Ms. Maxwell, and "who, in response to the attack, responds in kind." *Id.* The privilege of the initially-attacked person (Ms. Maxwell) includes in rebuttal of the initial attack the right to speak the truth, but the right to rebut is not confined to the truth or to mere denial:

> This defense of reply is material, of course, only where the response in kind is defamatory. The injury, if any, to plaintiff is excused, because it is the plaintiff who started the altercation. . . .
>
> It is a contradiction in terms to say that the one attacked is a privileged only to speak the truth, and not to make a counter attack, or that legitimate self-defense consists only in a denial of the charge or a statement of what is claimed to be the truth respecting its subject-matter.

Id. (emphasis supplied; quoting *Collier v. Postum Cereal Co.*, 134 N.Y.S. 847, 853 (1st Dep't 1912)); *see generally Restatement of the Law of Torts* (Second) § 594 cmt. k (1977) (noting that to protect her reputation from attack by another person, she is conditionally privileged to publish defamatory matter about her attacker reasonably believed necessary to defend her reputation, "including the statement that [her] accuser is an unmitigated liar").

A defendant asserting the defense of reply need only establish she has been attacked with a defamatory statement. *See id.* at 297. Beginning no later than 2009 plaintiff attacked Ms. Maxwell with defamatory statements. In 2014, plaintiff knew the press was giving extensive coverage to, and scrutinizing all filings in, the Crime Victim's Rights Act case pending in the United States District Court for the Southern District of Florida and in plaintiff's 2009 civil action against Mr. Epstein. Knowing this, plaintiff repeatedly filed papers in court alleging that Ms. Maxwell participated as a "recruiter" in a "sex trafficking" scheme operated by Mr. Epstein. *E.g.,* Exhibit D. In 2011, plaintiff granted "exclusive" interviews to the British tabloid press during which she repeated her false allegations against Ms. Maxwell and also alleged that as part of the "sex trafficking" scheme she had sex with numerous prominent public figures, including

Prince Andrew and Harvard law professor Alan Dershowitz. EXHIBIT A. The false allegations against Ms. Maxwell constituted defamation *per se*.

A plaintiff may defeat a qualified privilege only by proving actual malice. *See, e.g.*, *Kane v. Orange Cnty. Publ'ns*, 649 N.Y.S.2d 23, 26 (App. Div. 1996) (qualified privilege of reply); *see generally Gertz*, 418 U.S. at 323; *Restatement (Second) of Torts*, *supra*, § 594 cmt. b.

E. The January 2015 statement was substantially true, and plaintiff cannot produce clear and convincing evidence of its falsity.

The January 2015 statement accurately and properly denies the factual assertions regarding Ms. Maxwell contained within plaintiff's joinder motion that had been issued two days prior to which it responded. With respect to each claim in the joinder motion that concerns Ms. Maxwell, the evidence elicited through discovery undercuts any evidence – clear and convincing or otherwise – that plaintiff may proffer to buttress her false allegations.

1. The January 2015 statement accurately denied that Ms. Maxwell met Plaintiff when Plaintiff was 15 years old in 1999.

Plaintiff's relative youth at the time of her initial contact with Epstein and Maxwell forms the core of Plaintiff's story, in her joinder motion and in the press, that she was an underage victim of sexual slavery. Plaintiff has made a point of mentioning her age of 15, in the year 1999, as the starting point for her "four years" of "sex slavery" at every opportunity. The young age no doubt heightens the offensiveness of the claimed abusive conduct and also supplies enough time to allow for the "thousands" of times she was purportedly abused and the numerous opportunities for her to be trafficked to countless famous individuals. Reiterating this point in the joinder motion, plaintiff asserted again that she met Ms. Maxwell in the year 1999 when she was a mere 15 years old. EXHIBIT D at 3.

As she now admits and her employment records confirm, plaintiff did not actually meet Ms. Maxwell or Epstein until the year 2000. Plaintiff acknowledges that she did not meet Ms.

Maxwell until she worked at the Mar-A-Lago as a spa attendant, and she confirms that she obtained that job with the assistance of her father who already was employed as a maintenance worker at the club. Records subpoenaed from Mar-A-Lago reflect that plaintiff's father commenced employment on April 11, 2000. EXHIBIT S. Additionally, they show that plaintiff terminated in the year 2000. *Id.* Finally, plaintiff's social security report confirms plaintiff's Mar-a-lago employment was confined to calendar year 2000. EXHIBIT R. Faced with overwhelming proof that her claims of meeting Ms. Maxwell at the age of 15 in the year 1999 were false, plaintiff finally conceded as much at her deposition on May 3, 2016. EXHIBIT N at 25-28. She also confessed that she did not spend her "sweet 16th" birthday with Ms. Maxwell, as detailed in her book manuscript and in the press. *Compare* EXHIBIT N at 101-02 *with* EXHIBIT KK at Giuffre04173 ("I spent my sweet 16th birthday on his island in the Caribbean next to 'St. James Isle' he liked to call it 'Little St. Jeff's', his ego was as enormous as his appetite for fornicating. I was given a birthday cake and a new collection of designer make-up from London. Ghislaine made a joke after I blew out my array of candles and said, 'I'd be soon getting too old for Jeffrey's taste, and soon they'd have to trade me in.'"); Paul Lewis, "Jeffrey Epstein: Inside the Decade of Scandal Entangling Prince Andrew," The Guardian (Jan. 10, 2015)[33].

Yet, even after conceding she was off by a year, plaintiff persists in suggesting that she must have been a mere "16 year old" when she worked at Mar-a-Lago and met Ms. Maxwell. It was, she testified, a "summer job" for which she had taken a break from school, and she did not turn 17 until later that summer on August 9, 2000. EXHIBIT N at 25-28, 57,104, 113. But the Mar-a-Lago documents conclusively disprove this claim: the spa where plaintiff worked closes every year from Mother's Day until November 1. EXHIBIT U at Mar-a-Lago0212 ("The club

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[33] https://www.theguardian.com/world/2015/jan/10/jeffrey-epstein-decade-scandal-prince-andrew (last visited Jan. 6, 2017).

never shuts down from November 1 to Mother's Day."). Spa attendants such as plaintiff are "seasonal" employees. *Id.* Indeed, the spa advertises for its new employees in local newspapers in the fall of every year. EXHIBIT V. Even plaintiff's father – a long time employee of Mar-a-Lago -- described the seasonal nature of the club during his deposition: "[Plaintiff's employment] was probably for a season because Mar-a-Lago is seasonal. I mean, I was there year round but a lot of people are seasonal, you know, because it's like snowbirds, you know, summertime comes and nobody wants to be down in south Florida….[The season is] probably from September or October to, you know, maybe May, I guess." EXHIBIT T at 72. With the spa closed from Mother's Day to November 1, plaintiff could not have had a "summer job" and could not have worked at Mar-a-Lago until November 2000, at the earliest, when she was over 17 years old.

In sum, Plaintiff's claim in the Joinder Motion that she met Ghislaine Maxwell in 1999 when she was 15 years old is a false statement. Therefore, the January 2015 statement calls the allegations against her "untrue" was factually accurate.

2. The January 2015 statement accurately denied that Ms. Maxwell "regularly participate[d] in Epstein's sexual exploitation of minors" and that "the Government knows" such fact.

The January 2015 statement also accurately denied plaintiff's joinder motion allegation that "it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3." EXHIBIT D at 3. Ms. Maxwell did not "regularly participate in in Epstein's sexual exploitation of minors" as confirmed by the lead Palm Beach Detective, Joseph Recarey. Det. Recarey confirmed that none of the alleged Epstein victims ever mentioned Ms. Maxwell's name, either in reports he reviewed or in interviews he conducted. None of the alleged victims said they had been "recruited," paid or exploited by Ms. Maxwell. EXHIBIT GG at 10-11, 177, 180-82, 187-96, 241-42, 278. He verified that the twenty-

two page Palm Beach Police Department affidavit does not mention Ms. Maxwell's name once (*id.* at 177), and she was never considered a suspect and she was never mentioned in the grand jury testimony. *Id.* at 203. Ms. Maxwell was not seen coming or going from the house during any of the Palm Beach Police Department's surveillance of Epstein's home. *Id. at* 214-15. None of her property was seized from Epstein's home. *Id.* at 257. In sum, Det. Recarey denied that knowing anything "about Ghislaine Maxwell's sexual trafficking conduct." *Id.* at 278. He confirmed he has no knowledge that Ms. Maxwell sexually trafficking "anybody." *Id.* at 278-79. Likewise, he has no knowledge of Plaintiff's conduct that is subject of this lawsuit. *Id.* at 259-60. Plaintiff thus has uncovered no evidence that the "government" came to "know" that Maxwell participated in sexual exploitation of Jane Doe #3, i.e., Plaintiff. Plaintiff has not and cannot present clear and convincing evidence to demonstrate the falsity of Ms. Maxwell's denial.

3. The January 2015 statement accurately denied that "with [Ms. Maxwell's] assistance, [Epstein] converted [Plaintiff] into what is commonly referred to as a 'sex slave.'"

Plaintiff claimed in the joinder motion that Ms. Maxwell helped Epstein transform her into a "sex slave" as that term is "commonly" used, yet the incontrovertible evidence establishes the opposite. A "slave" as defined by Merriam-Webster is a "person held in servitude as the chattel of another." Oxford Dictionary defines "slave" as a "person who is the legal property of another and is forced to obey them." Common definitions of "sex slave" include a person who is confined and is raped, sexually abused or prostituted. *See* "Sex Slave," Free Dictionary, located at http://www.thefreedictionary.com/sex+slave (last visited Jan. 5, 2017) (underlining supplied). Plaintiff, however, was far from confined or the legal property of another.

Throughout 2000, 2001 and 2002, Plaintiff enjoyed complete freedom of movement and choice. She had a car and then a pickup truck she shared with Figueroa. EXHIBIT P at 67.. She traveled freely to and from multiple jobs working as a waitress, bird aviaries, veterinarian

hospital, Neiman Marcus, Oasis Outsourcing and Southeast Employee Management Company. EXHIBIT R. Plaintiff enrolled in school in June 2000 before she met Maxwell or Epstein and continued her enrollment throughout 2000, 2001 and until March 2002. EXHIBIT O. She worked at multiple restaurants and the animal hospital in 2002. EXHIBIT R. She came and went from her apartment, moved to a new apartment and then moved in with Figueroa's family. She held parties at her apartment with Figueroa and other friends. EXHIBIT Z. When something did not go well, she called the police and filed police reports, without mentioning anything about captivity, confinement or forced sexual exploitation or trafficking, much less "sex slavery." *Id.* and EXHIBIT AA. She had her own money, paid her rent, and bought a vehicle. To Figueroa, she seemed "excited" about meeting famous people and discussed it so much that he tuned it out. EXHIBIT P at 125-26. By any commonly understood definition of sex slavery, Plaintiff did not match the description.

Witness testimony and documentary evidence demonstrate the absence of substantial truth to Plaintiff's claim that Maxwell assisted Epstein in converting her into what is commonly referred to as a "sex slave." The January 2015 statement's denial of that claim cannot therefore be defamatory.

4. The January 2015 statement accurately reported that Plaintiff alleged "sexual relations" with Professor Dershowitz which he denied.

The January 2015 statement accurately reports that "now it is alleged that Alan Derschowitz [sic] is involved in having sexual relations with [Plaintiff], which he denies." The joinder motion made such a claim and Professor Dershowitz publicly and vehemently denied any such sexual contact. *See, e.g.*, Dershowitz Denies Sex Charge, JTA (Jan. 2, 2015) ("Dershowitz

declared 'totally, unequivocally and completely false' allegations that he had sex with the former staffer for investor Jeffrey Epstein.").[34]

Professor Dershowitz has gone beyond a simple denial: he has sworn, repeatedly and in almost every conceivable forum, including the New York Times, the Wall Street Journal, and Good Morning America, that he never had any sexual contact with Plaintiff and never met her. As he set forth in this case in his Declaration in Support of Motion to Intervene, Plaintiff never mentioned his name during her weeklong 2011 interview with journalist Sharon Churcher. Doc.363. It was only after Churcher suggested to Plaintiff that she "must have" met Dershowitz because "we all know he's a pedo, though we have no proof of that" that Plaintiff then included Dershowitz in her book manuscript, not as a perpetrator of hers, but as someone she had "met" while with Epstein. *Id.* The CVRA joinder motion more than three years later was the first time plaintiff publicized her remarkable claim that she had been sexually trafficked to Dershowitz on "numerous occasions" "while she was a minor," in Florida, private planes, in New York, New Mexico, and the U.S. Virgin Islands. EXHIBIT D.

Dershowitz, in his own subsequent defamation action against plaintiff's attorneys Edwards and Cassell, produced approximately 10,000 pages of documents capturing his travels during the 1999-2002 timeframe, none of which coincided with Plaintiff's story. For example, Dershowitz demonstrated that the only time he visited Epstein's home in the U.S. Virgin Islands he was accompanied by his wife and his 12 year old daughter. Plaintiff, on the other hand, produced no records demonstrating that any portion of her allegation against him is true. For example, she claimed one sexual encounter occurred on a private plane on which she traveled

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[34]http://www.jta.org/2015/01/02/news-opinion/united-states/dershowitz-denies-lawsuits-sex-charges?utm_source=twitterfeed&utm_medium=twitter&utm_campaign=jtafeed (last visited Jan. 5, 2017).

with Professor Dershowitz. EXHIBIT II at 85. None of the flight logs reveal a flight with the two of them as passengers. EXHIBIT BB. Another time, plaintiff claims, she and Epstein flew together to Boston and she engaged in sexual relations with Professor Dershowitz in the backseat of a limousine between the airport and his home with another female and Epstein next to them. EXHIBIT II at 110-15. No flight logs document any trip with Epstein and plaintiff to Boston and plaintiff cannot recall the other female in the car. EXHIBIT II at 113.

Professor Dershowitz has signed affidavits, provided sworn deposition testimony and sworn pleadings, offered to take a lie detector test, offered to waive the statute of limitations as to himself, and given countless broadcast and news interviews disclaiming any sexual contact with Plaintiff and calling her an outright "liar."[35] The January 2015 statement recounting the allegation against him and his denial is substantially true.

5. The January 2015 statement accurately denied that Ms. Maxwell created and distributed child pornography and that the Government knows of and possesses such child pornography.

Plaintiff's next assertion regarding Maxwell in the joinder motion was that "Maxwell also took numerous sexually explicit pictures of underage girls involved in sexual activities, including Jane Doe #3," and that Maxwell "shared these photographs (which constituted child pornography under applicable federal laws) with Epstein." EXHIBIT D at 4-5. Plaintiff continued: the "Government is apparently aware of, and in certain instances possesses some of these photographs." *Id.* Yet again, the evidence demonstrates the falsity of Plaintiff's claim.

Detective Recarey testified that none of Epstein's alleged victims even mentioned Ms. Maxwell, much less claimed that she had taken naked photographs of them. EXHIBIT GG at 180-82, 187-96, 241-42, 278. Recarey also denied that any evidence belonging to Ms. Maxwell was

[35] Perhaps most telling, Plaintiff and her phalanx of attorneys have never sued Mr. Dershowitz for his many vociferous attacks on her credibility.

seized from Epstein's home during the execution of the search warrant, which would include any "child pornography" reportedly created by her. *Id.* at 257. Detective Recarey who had entered Epstein's home in 2002 to install security cameras to catch a thief did not observe any "child pornography" within the home, including on Epstein's desk where Plaintiff alleges he kept such a nude photograph of herself. *Id.* at 289-90. And Epstein's housekeeper, Juan Alessi, swore that he "never saw any photographs of Virginia Roberts in Mr. Epstein's house," EXHIBIT HH at ¶ 17, contradicting Plaintiff's claims that nude photographs of her were prominently displayed throughout all of Epstein's homes.

No sexually explicit photographs of Plaintiff were ever produced in discovery in this case or subpoenaed by Plaintiff from any governmental agency. Plaintiff has presented no evidence the government "possesses" any such photographs or indeed ever became "aware of" them.

6. January 2015 statement accurately denied Maxwell acted as "madame" for Epstein to traffic Plaintiff to the rich and famous.

Finally, in the joinder motion, Plaintiff asserted that Ms. Maxwell had "facilitated" sexual abuse "by acting as a 'madame' for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes." Plaintiff has utterly failed to substantiate her allegation.

Not a single "other young girl" made a claim that Maxwell, or even Epstein for that matter, trafficked them to a third-person for commercial sexual acts. Detective Recarey confirmed that he had no knowledge of Ghislaine Maxwell sexually trafficking anyone. EXHIBIT GG at 278-79. He also confirmed that not a single one of the alleged victims of Epstein ever claimed to have any sexual contact with any man other than Epstein, or that they were sent to another location to have sex with another man or to give a massage to another man. *Id.* at 300-02. None of the other alleged victims of Epstein ever claimed to have gone on his plane with him

or to have had sexual acts with him on his plane. *Id.* at 302-04. None claimed they had gone to New York with him and stayed in his residence. *Id.* at 304-05. Plaintiff, it appears, is the only alleged victim of Epstein who claims she was the subject of such trafficking, yet even she has retracted, amended, and withdrawn many of her allegations, thus rendering (by her own admission) such claim substantially untrue.

Foreign Presidents. Upon questioning under oath, Plaintiff admitted that she had never even met a "foreign president," much less ever been sexually trafficked to one or to the multiple "foreign presidents" referenced in the joinder motion.

> Q: The reference there to foreign presidents, do you see that?
>
> A: Yes.
>
> Q: You were sexually trafficked to foreign presidents?
>
> A: No.
>
> Q: So that's not true, you were not sexually trafficked to foreign presidents?
>
> A: I don't know what foreign presidents you're talking about.
>
> Q: Have you ever been sexually trafficked to any foreign president?
>
> [Objection interposed by Ms. McCawley; Special Master overruled]
>
> A: I understand well-known prime ministers and other world leaders; as far as foreign presidents, I'm not too sure, I don't know.
>
> Q: Have you ever met any foreign presidents?
>
> A: Foreign presidents as in overseas?
>
> Q: Sure, okay, overseas.
>
> A: No.
>
> Q: Have you ever met any foreign presidents from countries not overseas such as Canada or Mexico?
>
> A: No.
>
> Q: So you were not sexually trafficked to any foreign presidents, is that correct?
>
> A: As far as I know right now, yes.

Q: It's correct that you were not sexually trafficked to them, right?

A: You've asked me this three times and I'm telling you.

EXHIBIT II at 10-12. Indeed, Plaintiff became frustrated by what she perceived as the third time she was asked the question, each time denying that she had met a foreign president or been sexually trafficked to one, clearly indicating that she understood the question, had answered it in the negative and did not want to be re-asked the question again.[36] Notably, not a single "foreign president" is listed as a witness with knowledge of Plaintiff's claims in her Rule 26 disclosures.

"Well-known prime minister." Plaintiff also has failed to establish any evidence to support her fantastical claim that she was sexually trafficked to a "well-known prime minister." When questioned, she refused to disclose the identity of the prime minister, even with the protection of a protective order. EXHIBIT II at 12. She has not produced photographs of her with any well-known prime minister, nor any flight log showing a well-known prime minister on Epstein's airplane. She has not identified herself as being in any location with a well-known prime minister, nor the date of any such encounter. The only evidence that Plaintiff has ever been even in the company of a well-known prime minister is her uncorroborated word.

"World leaders." Likewise, when asked about "world leaders" to whom she was trafficked, Plaintiff referred vaguely to someone she was introduced to as a "prince."

Q: Other world leaders, what other world leaders were you sexually trafficked to?
[Objection interposed and overruled by Special Master]
A: Okay. Prince Andrew for one.
Q: Other than Prince Andrew?

[36]Plaintiff and her counsel later devised a plan to just outright change these three answers through the errata sheet, claiming that Plaintiff had "misunderstood the question" and she had in fact been trafficked to such a president. EXHIBIT JJ. As her clear answers and frustration at the repeated nature of the questioning demonstrates, however, she had no trouble whatsoever understanding the question at the time.

> A: There is another individual that I honestly do not know his name.
>
> Q: What country is he from?
>
> A: I'm not too sure, he spoke in a foreign—he did speak foreign tongue, he spoke English as well, but I'm not too sure where he was from?
>
> Q: How do you know he is a world leader?
>
> A: I was introduced to him as a prince.
>
> …
>
> Q: Did you – where were you when you met him?
>
> A: On this occasion the South of France.
>
> …
>
> Q: Where in the South of France were you?
>
> A: I don't know.
>
> Q: Were you on a boat, were you in a house?
>
> A: We were at a like a cabana, not cabana, like a resort, but it was a big party.
>
> Q: Who was throwing the party?
>
> A: I don't know. I was just brought there.

EXHIBIT II at 15-17. Indeed, this is almost the identical answer that Plaintiff later gave when questioned about what which "powerful businessmen" she had been sent to have sex with:

> Q: Where were you sent to have sex with the owner of a large hotel chain by Ghislaine Maxwell?
>
> A: I believe that was one time in France.
>
> Q: I believe it was around the same time that Naomi Campbell had a birthday party.
>
> A: Where did you have sex with the owner of a large hotel chain in France around the time of Naomi Campbell's birthday party?
>
> A: In his own cabana townhouse thing. It was part of a hotel, but I wouldn't call it a hotel. . . .

EXHIBIT N at 203. In fact, Naomi Campbell's birthday is May 22, 1970. [WIKIPEDIA]. The flight logs do not show plaintiff traveling to France in May 2001 or May 2002. EXHIBIT BB at DR_0046, DR_0056. On May 22, 2002, for example, Epstein was in Russia.

In her joinder motion, Plaintiff made the additional claim that Epstein (not Maxwell) sexually trafficked her to "model scout" Jean Luc Brunel on numerous occasions and in numerous places, including "the South of France." EXHIBIT D at 5-6. The flight logs, however, demonstrate that Plaintiff was never in the "south of France," much less on multiple occasions. The one and only trip reflecting travel by Plaintiff to France was a trip on March 6, 2001 from a fueling stop in Canada to Paris, followed by a departure from Paris on March 8, 2001 to Granada. EXHIBIT BB at DR_000043; EXHIBIT CC at 107. Although there are other flights in which Epstein went to Nice in the south of France, Plaintiff is not on any of them and none are near Naomi Campbell's birthday on May 22.

Plaintiff's claim in her joinder motion about having been trafficked to other "prominent American politicians" and other world leaders have gone unsubstantiated and are patently incredible. Because these men are publicized to have been in the company of Epstein on at least one occasion, such was apparently sufficient for Plaintiff to claim she had been trafficked to them. For example, Plaintiff claimed at her deposition that these powerful men to whom she was trafficked included Marvin Minsky. EXHIBIT N at 204. Dr. Minsky, a world-renowned scholar and long-time professor at MIT, passed away in January 2016 at the age of 88. [37] At the time of his passing, he had been married to his wife, pediatrician Dr. Gloria Rudisch, since 1952 and had three children and four grandchildren. His name appears on one of Epstein's flight logs as having traveled with a large group of individuals, including plaintiff, from New Jersey to Santa Fe on

[37] https://www.bostonglobe.com/metro/2016/01/25/marvin-minsky-dies-mit-professor-helped-found-field-artificial-intelligence/A8y6ey8S0QAaao463Z2ooO/story.html

March 29 and returning on March 31, 2001.[38] The other passengers included world-renowned philanthropist Dr. Henry Jarecki, now aged 83, also a long-time husband, famed academic and scholar, and famous philanthropist.[39]

Plaintiff produced no evidence substantiating any of her fantastical claims that she had been trafficked by Epstein, or by Maxwell, to any of these men or any others. No witnesses vouched for seeing plaintiff in the company of politicians George Mitchell or Bill Richardson to whom plaintiff claims she was sent. She produced no photographs of herself with them. She had a journal where she claims she documented their names, but she claims she burned that journal in 2013. In May 2011, plaintiff inquired by email to journalist Sharon Churcher to "remind" her of the famous people to whom she was trafficked. Plaintiff has not supported her claims with clear and convincing evidence and thus, Ms. Maxwell's denials and characterizations of these claims as "obvious lies" is not defamatory as a matter of law.

CONCLUSION

For the foregoing reasons, the Court should grant summary judgment in favor of Ms. Maxwell.

[38] Plaintiff claims, however, that she was trafficked to Dr. Minsky in the U.S. Virgin Islands.

[39] https://en.wikipedia.org/wiki/Henry_Jarecki

January 6, 2017.

Respectfully submitted,

/s/ Laura A. Menninger

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CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Memorandum in Support of Defendant's Motion for Summary Judgment* via ECF on the following:

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--X

15-cv-07433-RWS

Declaration of Laura A. Menninger in Support of
Defendant's Motion For Summary Judgment

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell in this action. I respectfully submit this Declaration in support of Ms. Maxwell's Motion for Summary Judgment.[1]

2. Attached as Exhibit A is a true and correct copy of an article by Sharon Churcher entitled "Prince Andrew and the 17-year-old girl his sex offender flew to Britain to meet him," DAILY MAIL, dated March 2, 2011.

[1] At trial, defendant intends to produce either the custodian of record relevant to any disputed document or a certification in compliance with either Fed. R. Evid. P. 803 and/or 902. *See* Fed. R. Civ. P. 56(c). Apart from deposition testimony, the majority of non-deposition documents herein were either produced by plaintiff or obtained with releases signed by plaintiff.

3. Attached as Exhibit B is a true and correct copy of an article by Sharon Churcher entitled "Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton," DAILY MAIL, dated March 5, 2011.

4. Attached as Exhibit C is a true and correct copy of a statement on behalf of Ms. Maxwell dated March 9, 2011.

5. Attached as Exhibit D (filed under seal) is a true and correct copy of the corrected Motion for Joinder, *Doe v. United States*, No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Jan. 2, 2015).

6. Attached as Exhibit E is a true and correct copy of an Order Denying Motion to Join Under Rule 21, *Doe v. United States,* No. 08-80736-Civ-Marra/Johnson (S.D. Fla. Apr. 7, 2016).

7. Attached as Exhibit F is a true and correct copy of a statement on behalf of Ms. Maxwell dated January 2, 2015.

8. Attached as Exhibit G (filed under seal) are true and correct copies of excerpts from the November 18, 2016 deposition of Ross Gow, designated Confidential under the Protective Order.

9. Attached as Exhibit H (filed under seal) is a true and correct copy of Plaintiff's Response to Second Request for Production and to Interrogatories and Requests for Admissions, dated July 1, 2016.

10. Attached as Exhibit I (filed under seal) is a true and correct copy of Plaintiff's Supplemental Responses to to Interrogatory Nos. 6, 12 and 13, dated August 17, 2016, designated Confidential under the Protective Order.

11. Attached as Exhibit J (filed under seal) is a true and correct copy of the Declaration of Ghislaine Maxwell, dated January 6, 2017.

12. Attached as Exhibit K (filed under seal) is a true and correct copy of the Declaration of Philip Barden, dated January 6, 2017.

13. Attached as Exhibit L (filed under seal) are true and correct copies of excerpts from the June 23, 2016 deposition of James Austrich, designated Confidential under the Protective Order.

14. Attached as Exhibit M (filed under seal) is a true and correct copy of Plaintiff's passport application, dated January 12, 2001, designated Confidential under the Protective Order.

15. Attached as Exhibit N (filed under seal) are true and correct copies of excerpts from the May 3, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

16. Attached as Exhibit O (filed under seal) are true and correct copies of Plaintiff's school records Bates stamped GM_00888 and GIUFFREE004981-88 and designated Confidential under the Protective Order.

17. Attached as Exhibit P (filed under seal) are true and correct copies of excerpts from the June 24, 2016 deposition of Tony Figueroa, designated Confidential under the Protective Order.

18. Attached as Exhibit Q (filed under seal) are true and correct copies of excerpts from the November 14, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

19. Attached as Exhibit R (filed under seal) is a true and correct copy of Plaintiff's Social Security records dated October 25, 2016, Bates stamped GIUFFRE009175, designated Confidential under the Protective Order.

20. Attached as Exhibit S (filed under seal) is a true and correct copy of Mar-A-Lago records, Bates stamped MAR-A-LAGO-0001 and MAR-A-LAGO-0161-0177.

21. Attached as Exhibit T (filed under seal) is a true and correct copies of excerpts from the May 20, 2016 deposition of Sky Roberts, designated Confidential under the Protective Order.

22. Attached as Exhibit U (filed under seal)) is a true and correct copy of the Mar-A-Lago employee handbook, dated October 28, 1995, Bates stamped MAR-A-LAGO-0178-0243.

23. Attached as Exhibit V (filed under seal) is a true and correct copy of the Mar-A-Lago advertisement, Bates stamped MAR-A-LAGO-0086.

24. Attached as Exhibit W (filed under seal) is a true and correct copy of Plaintiff's Courtyard Animal Hospital employment application, Bates stamped GIUFFRE009201-11, designated Confidential under the Protective Order.

25. Attached as Exhibit X(filed under seal) is a true and correct copy of the Royal Palm Beach Police Department Offense Report date, June 10, 2001, Bates stamped GM_00780-82.

26. Attached as Exhibit Y (filed under seal) is a true and correct copy of the Royal Palm Beach Police Department Probable Cause Affidavit date, November 19, 1999, Bates stamped GM_01223-28.

27. Attached as Exhibit Z (filed under seal) is a true and correct copy of the Royal Palm Beach Police Department Offense Report date, August 3, 2001, Bates stamped GM_00777-79.

28. Attached as Exhibit AA (filed under seal) is a true and correct copy of the Palm Beach County Sheriff's Offense Report date, June 02, 2002, Bates stamped GM_00748-79.

29. Attached as Exhibit BB (filed under seal) are true and correct copies of David Rodgers flight logs from November 1995 to May 2013, Bates stamped DR__0001-DR0107.

30. Attached as Exhibit CC (filed under seal) is a true and correct copy of excerpts from the June 3, 2016 deposition of David Rodgers, designated Confidential under the Protective Order.

31. Exhibit DD left intentionally blank.

32. Attached as Exhibit EE (filed under seal) is a true and correct copy of the Royal Palm Beach Police Citation Tracking Report date, June 19, 2002, Bates stamped GM_00776.

33. Attached as Exhibit FF (filed under seal) is a true and correct copy of the Palm Beach County Sheriff's Offense Report, Bates stamped GM_01202-28.

34. Attached as Exhibit GG (filed under seal) is a true and correct copies of excerpts from the June 21, 2016 deposition of Joseph Recarey, designated Confidential under the Protective Order.

35. Attached as Exhibit HH (filed under seal) is a true and correct copy of the Affidavit of Juan P. Alessi, dated January 13, 2016, Bates stamped GM_01197-1201.

36. Attached as Exhibit II (filed under seal) is a true and correct copy of excerpts from the Deposition of Virginia Giuffre taken in *Cassell v. Dershowitz,* on January 16, 2016, and designated as Confidential under the Protective Order.

37. Attached as Exhibit JJ (filed under seal) is a true and correct copy of Errata Sheet from the January 16, 2016 deposition of Virginia Giuffre taken in *Cassell v. Dershowitz*, dated February 11, 2016 and designated by Plaintiff as Confidential under the Protective Order.

38. Attached as Exhibit KK (filed under seal) is a true and correct copy of The Billionaire Playboys Club book manuscript, designated by Plaintiff as Confidential under the Protective Order.

39. Attached as Exhibit LL is a true and correct copy of the Victims Refuse Silence, Inc. Articles of Incorporation dated December 23, 2014, GIUFFRE001064-65.

40. Attached as Exhibit MM (filed under seal) is a true and correct copy of excerpts from the September 8, 2016 deposition of Brittany Henderson, designated Confidential under the Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2017.

s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on January 6, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Motion for Summary Judgment* via ECF on the following:

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Nicole Simmons

EXHIBIT A

Prince Andrew and the 17-year-old girl his sex offender friend flew to Britain to meet him

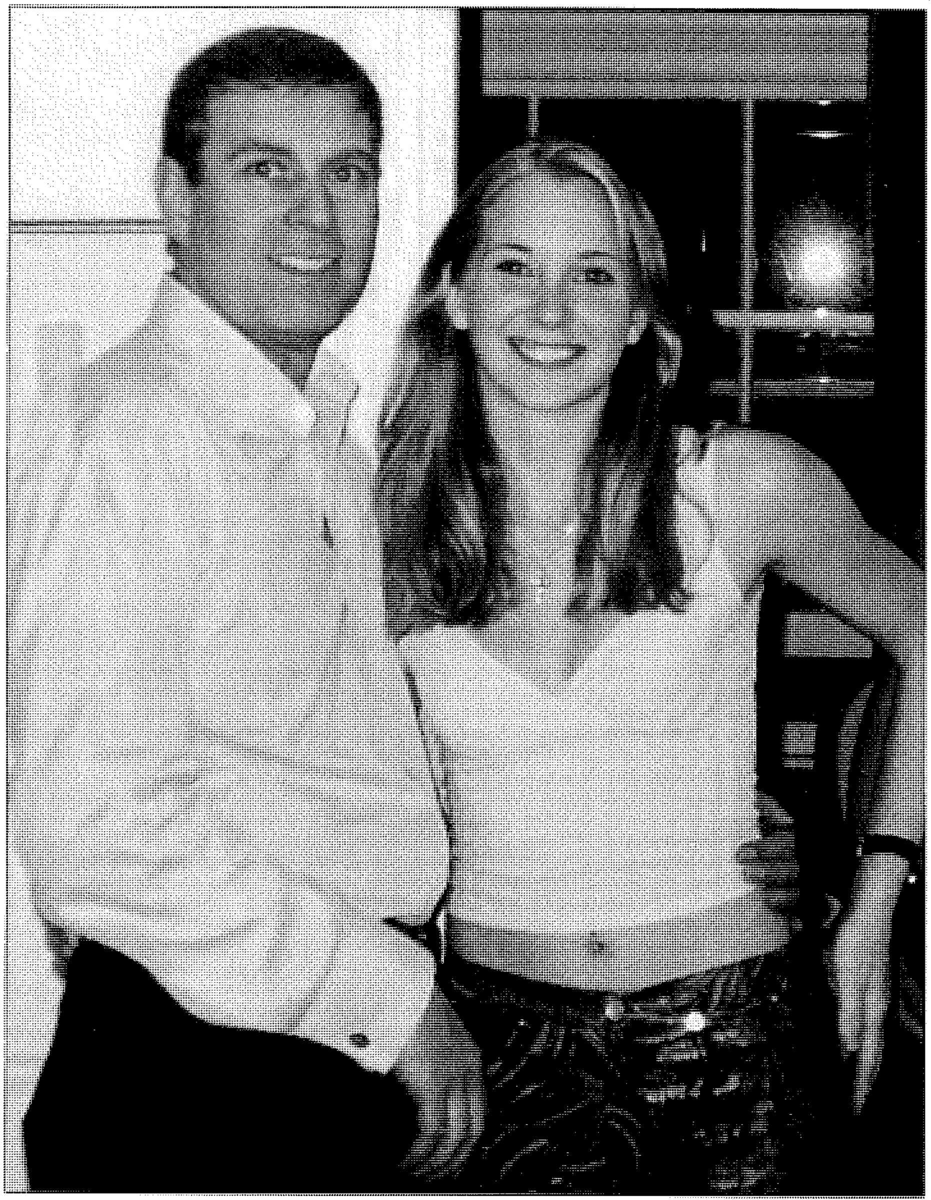
By SHARON CHURCHER
UPDATED: 08:02 EST, 2 March 2011

- Virginia Roberts reveals she is 'Jane Doe 102' in Jeffrey Epstein case
- Mother-of-three spent four years as millionaire's personal masseuse
- She describes being flown across world to meet Prince Andrew
- Epstein trained her 'as a prostitute for him and his friends'

As the UK's special representative for international trade, the Duke of York holds an important position, requiring sound judgement and widespread respect.

But those qualities have been thrown into question since photographs of Prince Andrew with his billionaire financier friend Jeffrey Epstein, a convicted child-sex offender who was jailed for 18 months for soliciting underage prostitutes, appeared last weekend.

Today, however, even more serious doubts are cast on his suitability after a woman at the centre of the Epstein case revealed to The Mail on Sunday that she had, as a 17-year-old employed by Epstein, been flown across the world to be introduced to the Prince.



First meeting: Prince Andrew puts his arms around 17-year-old Virginia, centre

On one of those occasions Virginia Roberts was subsequently paid $15,000 (£9,400). Her shocking account of her four years as Epstein's personal masseuse is supported by court documents, an eyewitness, photographs and flight details of Epstein's private jets.

One picture, said to have been taken by Epstein during Andrew's first encounter with the girl in March 2001 and published today by The Mail on Sunday, shows the Prince with his arm around her waist.

This is not the first time the Duke of York's judgment and choice of associates have been questioned. He appears to relish the company of super-rich oil billionaires from the Middle East, North Africa and the former Soviet Union.

The peculiar sale of his former marital home to a Kazakh businessman for £15 million after it had languished unsold for five years at £12 million has never been satisfactorily explained.

In the recent leak of American diplomatic cables it was revealed that he had criticised an official corruption investigation into the huge Al-Yamamah arms deal between Britain and Saudi Arabia, while he is also said to be close to Saif Al-Islam Gaddafi, son of the beleaguered Libyan president, and may have had a role in the early release of Lockerbie bomber Abdelbaset Al Megrahi.

While on the streets, I slept with men for money. I was a paedophile's dream

But it is Andrew's friendship with Epstein, whom he has known since at least 2000, and with Epstein's confidante Ghislaine Maxwell, daughter of the late disgraced newspaper baron Robert Maxwell, that gives most concern.

He was first seen with the pair on holiday in Thailand, and was pictured cavorting with Ghislaine at a Halloween fetishthemed party in

Manhattan.

The photograph that appeared last weekend shows the prince strolling through Central Park with 58-year-old Epstein. Andrew was said to have spent four days at his New York mansion in December, when he was joined by other distinguished guests, including Woody Allen, at a dinner.

It is by no means the first New York soiree Andrew has attended as Epstein's guest.

A lengthy profile of the financier in Vanity Fair magazine some years ago reported that Andrew was a guest at a cocktail party thrown by Epstein and Maxwell packed with young Russian models. 'Some guests were horrified,' said the article's author, Vicky Ward.

It should not be forgotten that Epstein is a registered sex offender after recently completing his sentence for offences relating to child prostitution.

However, he avoided trial on more serious charges that carried a potential life sentence. And no one reading The Mail on Sunday's interview with the woman who was prepared to testify against him can be in any doubt of the seriousness of the charges.

Epstein, a Wall Street money manager who once counted Bill Clinton and Donald Trump among his friends, became the subject of an undercover investigation in 2005 after the stepmother of a 14-year old girl claimed she was paid $200 (£125) to give him an 'erotic massage'.

The subsequent FBI probe uncovered at least 20 girls levelling sexual allegations against him. Eventually, Epstein struck a 'plea bargain' with prosecutors – a practice not permitted under British law – under which he was allowed to plead guilty to two relatively minor charges.

Police claim that his donations to politicians and his 'dream team' of influential lawyers deterred prosecutors from bringing more serious charges of sex-trafficking. The deal certainly kept the names of a lot of Epstein's famous friends out of an embarrassing court case.

However, an unusual part of the agreement was that Epstein's alleged victims were allowed to bring civil proceedings against him.

He has so far made 17 out-of-court settlements, and some cases are ongoing. One of these girls was to have been a key witness for the prosecution had the case gone to trial. She was just 15 years old when she was drawn into Epstein's exploitative world in 1998.

In her civil writ against him, under the pseudonym Jane Doe 102' she alleged that her duties included being 'sexually exploited by Epstein's adult male peers including royalty'.

Now, horrified by the evidence of Epstein and Andrew enjoying each other's company in New York, Jane Doe 102 has agreed to waive her anonymity and tell for the first time her deeply disturbing story.

Her real name is Virginia Roberts and she now lives in Australia, where she is a happily married mother of three.

Over the course of a week during which she spoke at length to The Mail on Sunday, she appeared sometimes vulnerable, and sometimes steely, but always quietly resolute and consistent.

Revisiting events from a past that she had hoped she had left behind,Virginia occasionally buried her face in her hands.

Some recollections – and, for reasons of taste, not all the details can be included here – caused her to flush with shame. 'I'm telling you things that even my husband didn't know,' she said.

Virginia, who has undergone counselling to try to come to terms with her past, is honest about her initiation into Epstein's depraved world.

She was a troubled teenager, whose slender figure, delicate complexion, hesitant voice and soulful blue eyes made her look young for her years.

Born in Sacramento, California, in August 1983, Virginia spent her early years on a small ranch on the West Coast of America.

This seemingly idyllic childhood ended when she was sexually molested by a man close to her family.

The fallout from that led to her parents temporarily splitting up. Blaming herself, Virginia began to get into trouble Aged 11, she was sent to live with an aunt but repeatedly ran away.

Living on the streets, she was beaten up and slept with at least two older men in return for food. 'I was a paedophile's dream,' she says.

Three years later, she was reunited with her family and started a new life with her father who had moved to Palm Beach,

Florida, where he was maintenance manager at Donald Trump's country club, Mar-a-Lago.

Virginia got a part-time job as a changing room assistant –which is where, soon after her 15th birthday, she met Ghislaine Maxwell, who invited her to work as Epstein's personal masseuse.

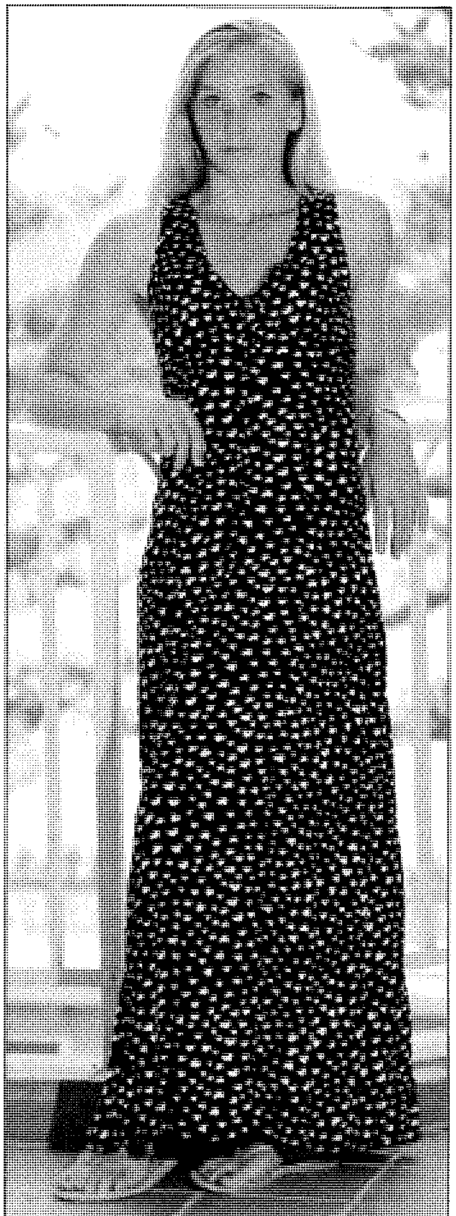
'I was wearing my uniform – a white miniskirt and a skin-tight white polo top – when I was approached by Ghislaine,' Virginia says.

'I told her I wanted to become a masseuse and she said she worked for a very wealthy gentleman who was looking for a travelling masseuse.

I'd get training and be paid well.'Virginia's father gave his blessing, believing his daughter was being handed the opportunity to learn a skill and to work for a wealthy and respectable employer.

He drove her to Epstein's pink mansion on the Palm Beach waterfront – he also owns a nine-storey home in New York, the city's biggest private residence; a 7,500-acre ranch called 'Zorro' in New

Mexico and Little Saint James, a private 70-acre atoll in the US Virgin Islands.



A new life: Virgina, now a mother-of-three, in Australia

Virginia says: 'Ghislaine said I was to start immediately and that someone would drive me home.

My father left and I was told to go upstairs.' She was led by another woman through Epstein's bedroom into a massage room where he lay face down naked on a table.

He started to interviewed Virginia. This was unconventional, but Virginia had no suspicions. Presumably, she thought, this was how the wealthy conducted their business.

Epstein elicited the information that Virginia had been a runaway, and was no longer a virgin.

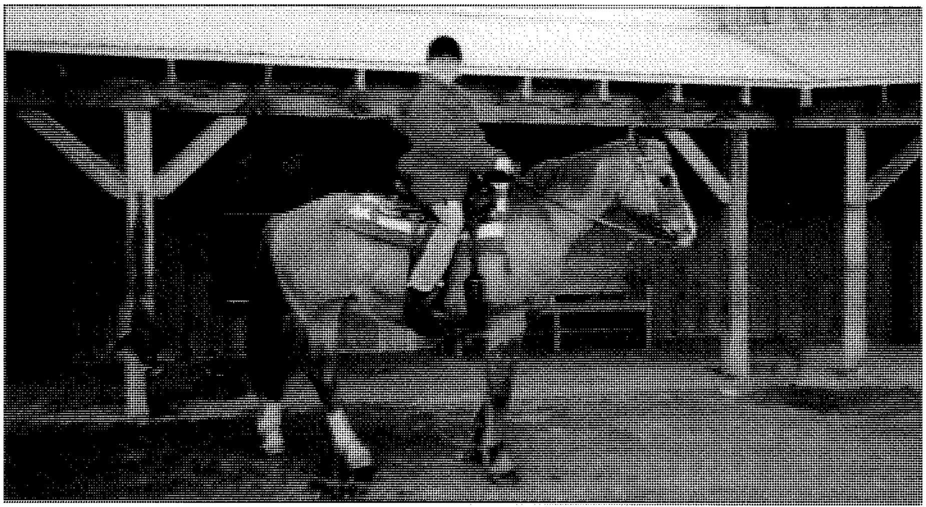
Virginia was then told to start massaging Epstein, under the instructions of the woman who had shown her in. The massage quickly developed into a sexual encounter.

Virginia was uncomfortable, but reluctant to deny such important people. 'My face was red with embarrassment,' she says. 'But I felt under immense pressure to please them.

The whole time it was going on, they were promising me the world, that I'd travel with Jeffrey on his private jet and have a well-paid profession.' Afterwards, she was given two $100 bills and told to return the next day.

That was the beginning of the four years she spent with Epstein.

For three of those years, she was under Florida's age of consent, which is 18.


Troubled teenager: Virginia on the billionaire's Zorro ranch in New Mexico in 2001

Virginia was fascinated by his life story: the son of a humble New York City parks worker, he was a teacher before becoming a Wall Street broker and friends with the upper echelons of the political, financial and academic establishment.

As a confused teenager, Virginia easily fell into the practice of sexually gratifying him for money.

He guaranteed her a minimum of $200 each time she gave him what he called an 'erotic massage.'

Virginia said: 'I would always receive the money immediately. He would give me the cash from a wad he carried in a black duffel bag or an assistant paid me.

'And, because of the way Epstein had warped her sensibilities, every time she took the cash, Virginia felt even more indebted to him. Secretly, he was also preparing her for an even more disturbing role.

'Basically, I was training to be a prostitute for him and his friends who shared his interest in young girls,' she says: 'After about two years, he started to ask me to "entertain" his friends.'

It started when Epstein called Virginia at the Palm Beach apartment he had rented for her.

She recalls: 'He said, "I've got a good friend and I need you to fly to the island to entertain him, massage him and make him feel how you make me feel."

Epstein had trained me to do whatever men wanted. I told myself I was special

He didn't spell out what I had to do. He didn't have to. 'He'd trained me to do whatever a man wanted. I was shocked but I told myself he was sharing me around because he trusted me and I was special.

I was worried, but I would do anything to keep Jeffrey happy and to keep my place as his number one girl.

He would keep telling me how lucky I was with the life I was leading and the money I was making. It was easy to fall into his grasp.

'The way it usually worked was I'd be sent to meet a man on the private island Jeffrey owned in the Caribbean, or at his ranch in New Mexico, which was really isolated.' She was 'given' to men ranging in age from their 40s to their 60s.

They included a well-known businessman (whose pregnant wife was asleep in the next room), a world-renowned scientist, a respected liberal politician and a foreign head of state.

None appeared to think the arrangement was unusual. Virginia says there were many other girls in Epstein's circle and that she was paid extra money to help recruit them.

'They would lounge around the Palm Beach house, the ranch or the island, nude or topless,' she says. 'But I was one of the very few he trusted as "special" and chosen to "entertain" his friends.'

Virginia took the sedative Xanax to detach herself from sordid reality. 'It was an escape drug,' she says. 'It made me calm and helped me forget about what I had to do. I was up to eight pills a day.'

Epstein had no objection to Virginia's use of prescription drugs, no doubt recognising that they made her even more malleable. 'I didn't want to go back to the life I'd had before' she says.

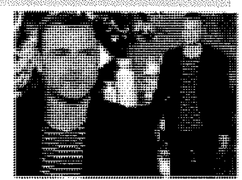
'That made me totally obedient.' Despite the fact that Epstein was, essentially, her pimp, this life now seemed normal to Virginia. 'I felt that he and Ghislaine really cared for me,' she said.

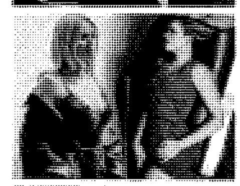
'We'd do family things, like watch Sex And The City and eat popcorn. 'A lot of it was very glamorous. I met famous friends of his such as Al Gore and Heidi Klum and Naomi Campbell. He introduced me as his "travelling masseuse."

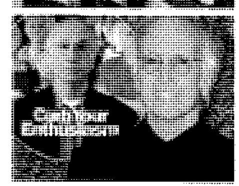
Some people mistook me for his daughter. 'When we were in New York or Palm Beach, Ghislaine and I would shop all day.

















Jeffrey bought me jewellery – diamonds were his favourite – and wonderful furniture. He was paying me very well because I'd give him sex whenever he wanted it.'

She was, she says, delighted when Epstein invited her to accompany him on a six-week trip in 2001.

'He said we'd be going to Europe and North Africa to meet architects and interior decorators because he wanted to redo his New Mexico house.

I threw my arms around him and gave him a peck on the cheek.' They flew to Paris, then Spain, then Tangier.

Finally, they went to London. 'After we landed, we drove straight to Ghislaine's house,' says Virginia. 'I was given a small upstairs bedroom. The following morning, Ghislaine came in.

She was chirpy and jumped on the bed saying, "Get up, sleepyhead. You've got a big day. We've got to go shopping. You need a dress as you're going to dance with a Prince tonight."

'She said I needed to be "smiley" and bubbly because he was the Queen's son.

Ghislaine and I went to Burberry, where she bought me a £5,000 bag, and to a few other designer stores where we bought a couple of dresses, a pair of embroidered jeans and a pink singlet, perfume and make-up.


Counselling: Virginia at her mother's home at Palm Beach in 1998

We got back to Ghislaine's house at around 4pm and I ran straight upstairs to shower and dress.

When I went downstairs, Ghislaine and Jeffrey were in the lounge. There was a knock at the door. Ghislaine led Andrew in and we kissed each other on the cheek. 'Ghislaine served tea from a porcelain pot and biscuits. She knew Sarah Ferguson and they talked fondly about Andrew's daughters.

Then Ghislaine asked Andrew how old he thought I was and he guessed 17 and they all laughed. Ghislaine made a joke that I was getting too old for Jeffrey.

She said, "He'll soon have to trade her in." It was widely known that he liked young girls.' The four of them went out to dinner and on to Tramp nightclub where, she says, Andrew danced with her.

'After about an hour-and-a-half, we drove back to Ghislaine's.

All of us went upstairs and I asked Jeffrey to snap a picture of me with the Prince. I wanted something to show my Mom. Ghislaine and Jeffrey left us after that, and later Andrew left.

'In the morning, Ghislaine said, "You did well. He had fun". We flew straight back to the States.' The Mail on Sunday has confirmed that the tycoon's jet flew to Paris on March 6, 2001, continuing to Granada, Tangier and London, before returning to New York.

On the last leg of the trip, Virginia was paid about $15,000 (£9,400) by Epstein. 'It was amazing money, more than I'd ever made on a trip with him before.

He didn't say there was any special reason, but I felt like I'd done everything he wanted. He was very pleased.'

There is no suggestion that there was any sexual contact between Virginia and Andrew, or that Andrew knew that Epstein paid her to have sex with his friends.

I took eight pills a day to help me forget what I had to do. It made me calm.

However, the Prince must have been aware of Epstein's conviction when he stayed with him in New York in December.

Virginia says she met Andrew for a second time around Easter 2001 at Epstein's Manhattan mansion.

'When I got to the mansion, I was told, "Get ready. You are meeting someone in the office" – which is what they called the library. Andrew was sitting there in a big leather armchair.

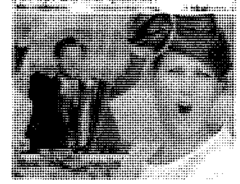
Ghislaine had just given him a present, a big toy that was his Spitting Image puppet. 'He was smiling ear-to-ear. He looked like a kid whose parents were taking him to Disney World.

A beautiful girl called Johanna Sjoberg who worked for Jeffrey was sitting on Andrew's knee. Ghislaine guided me over to Andrew and I think he recognised me, though I don't know if he remembered my name.

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Skinny Girl founder



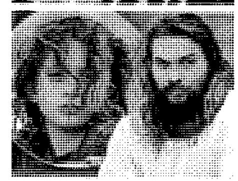
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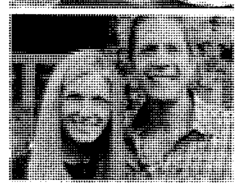
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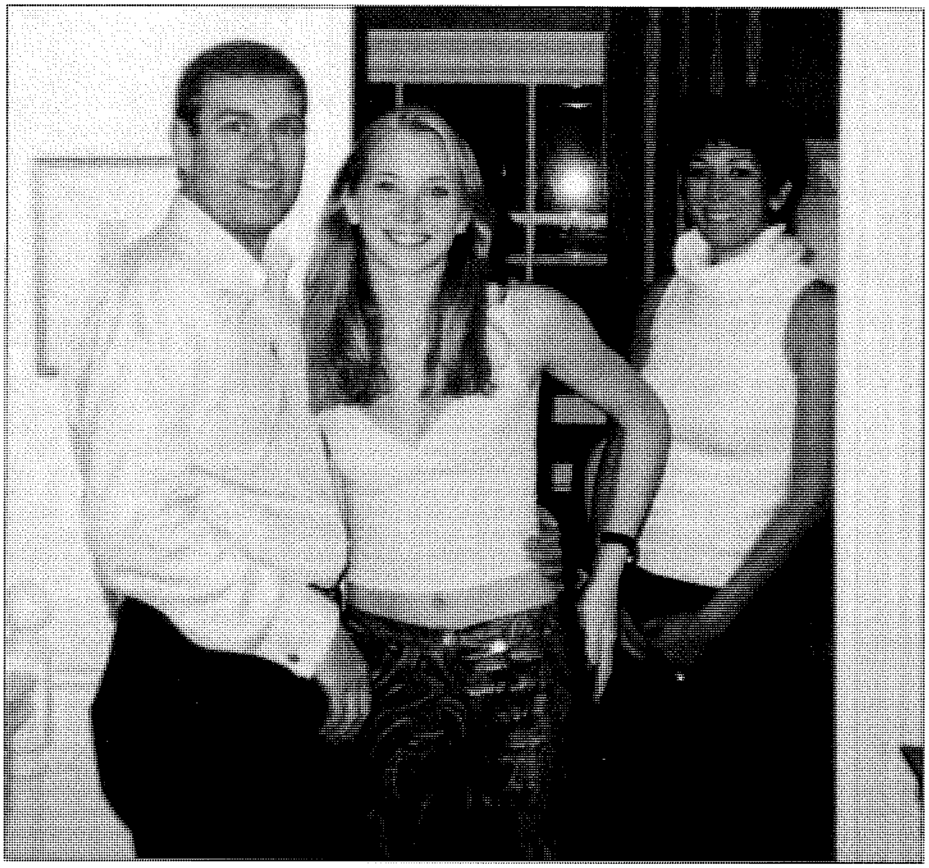
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Organiser: Ghislaine Maxwell looks on as Andrew put his arm around Virginia. Robert Maxwell's daughter invited her to work as Epstein's personal masseuse soon after her 15th birthday

We kissed on the cheek and Ghislaine placed me on his other knee.' Johanna spoke to The Mail on Sunday three years ago about this incident, which took place when she was 21.

She said: 'Ghislaine put the puppet's hand on Virginia's breast, then Andrew put his hand on my breast. It was a great joke. Everybody laughed.' After this, Virginia was paid, by Epstein, around $400 (£250).'

She met Andrew for the third and final time on Epstein's Caribbean island, Little Saint James. Virginia was never under the British legal age of consent when she met Andrew. She was 17 during the first two encounters and 18 at the third.

By now, however, Epstein, had started to hint that she was getting 'too old' for him.

But during one trip to the island, Epstein and Ghislaine made their most astonishing proposition, and one which repulsed her. 'They said Jeffrey wanted me to have his child,' she says.

'They said I was part of their family and I was beautiful,young, loyal and nurturing and would be a great mother.

They said I would have to sign a contract relinquishing rights to the child and consenting to Jeffrey having as many relationships as he liked. In return I would have my own mansion in Palm Beach and a large monthly payment, a percentage of his income.'

This, finally, was a wake-up call to Virginia and she began to see the way in which she had been groomed.

'It was a smack in the face,' she says. 'I finally realised this wasn't ever going to be a real relationship but I knew if I refused, I'd be thrown back on the streets. So I said, "I'm too young. I want to get my massage credentials, then maybe we'll do it".'

The tycoon took her at her word and, for her 19th birthday in August 2002, flew her to Thailand where he enrolled her in a massage course.

Shortly after arriving there, she met an Australian martial arts expert called Robert. They fell in love and, just ten days later, married in a Buddhist ceremony.

'I called Jeffrey and told him I'd fallen madly in love,' Virginia says. 'I was hoping he'd be delighted. But he said, "Have a nice life," and hung up on me.' The couple now have two sons, aged five and four, and a daughter who recently turned one.

'The first few months after I married Robert were the worst,' she says. 'I couldn't bring myself to tell him much. No man wants to know his wife has been traded out.

'I felt very alone. I was having panic attacks and seeing a psychiatrist and was on anti-depressants.

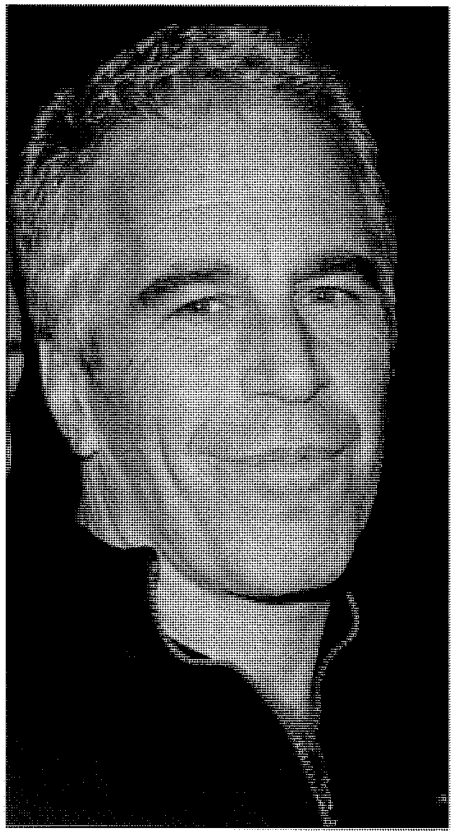
' Virginia was beginning to put her Epstein days behind her when, three years ago, she was phoned by the FBI.

'They said they had found photos of me at Jeffrey's Palm Beach house,' she says. '[Epstein had] hidden cameras watching me the entire time even when I was in the bathroom. I was so embarrassed.

'I told the FBI that my true purpose was sexual. They told me everything he did was illegal because I was under age.' (The age of consent in Florida is 18).

'They said that if it had to go to trial, they'd need me because I'd lived with him and that made me a key witness. I was very afraid, because he had so much power, but eventually I agreed to testify.

I was glad he'd finally been found out. He shouldn't be hurting other girls. Following Epstein's arrest, investigators are believed to have found a list of men's names on his computer and asked him whether they had been 'treated' to sexual encounters with his menage of minors.



Conviction: Jeffrey Epstein

'He took the Fifth Amendment, refusing to answer, indicating that if he were to answer the question, it could be incriminating,' a source told The Mail on Sunday.

Epstein struck a deal resulting in what commentators characterised as a 'slap on the wrist' for him, and ended up serving 13 months of his sentence, much of it in a liberal work-release programme Lawyer Brad Edwards, who represented several of Epstein's victims, said: 'Rather than punish him the way they would an average Joe, they sent a clear message that with enough money and power and influence, the system can be bought.'

Virginia was spared her the humiliation of having to go before a jury, and has kept her feelings bottled up until last weekend's photograph of Andrew with Epstein triggered distressing memories.

Virginia says: 'I am appalled. To me, it's saying, "We are above the law." But Jeffrey is a monster.'

Last night, neither Epstein, Ghislaine Maxwell nor Prince Andrew would comment on Virginia's story.

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Remembering his pal





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She's a mom-of-two

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She is 37



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Victoria's Secret Angel



EXHIBIT B

Teenage girl recruited by paedophile Jeffrey Epstein reveals how she twice met Bill Clinton

By SHARON CHURCHER and POLLY DUNBAR FOR MAILONLINE
UPDATED: 19:53 EST, 5 March 2011

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As a New Yorker from humble beginnings, Jeffrey Epstein played on his blue-collar credentials and enormous wealth to extend tentacles of influence throughout America's liberal political elite.

During the outcry over the Epstein case, it emerged that another man with a notorious appetite for young women, Bill Clinton, travelled with Epstein to a number of destinations, including three times on the billionaire's private aircraft.

On one occasion, Epstein flew the former President, Hollywood actor and staunch Democrat Kevin Spacey and another actor friend of Mr Clinton's, Chris Tucker, to Africa, to 'discuss AIDS policy'.





Claims: Virginia Roberts says she twice met ex-president Bill Clinton, pictured last month, but was never 'lent out'

Epstein, who has donated more than £75,000 over the years to candidates from the Democratic Party, also flew with Mr Clinton in November 2003 to destinations including Russia, Oslo, Hong Kong, Shanghai and Beijing.

Yet Virginia Roberts stresses that she was never 'lent out' to Mr Clinton.

On one occasion, she adds, Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr Clinton shortly after he left office. But, as far as she knows, the ex-President did not take the bait.

'I'd have been about 17 at the time,' she says. 'I flew to the Caribbean with Jeffrey and then Ghislaine Maxwell went to pick up Bill in a huge black helicopter that Jeffrey had bought her.

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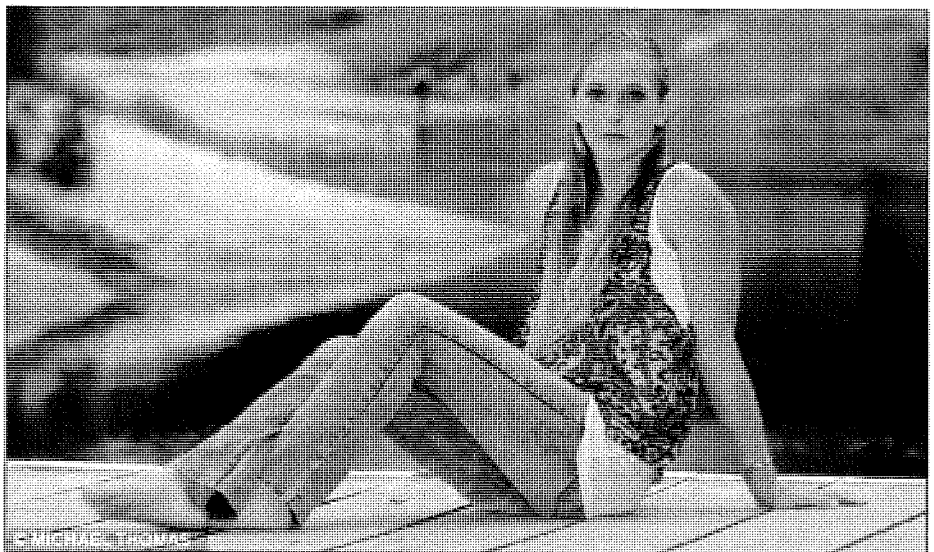
'She'd always wanted to fly and Jeffrey paid for her to take lessons, and I remember she was very excited because she got her licence around the first year we met.

'I used to get frightened flying with her but Bill had the Secret Service with him and I remember him talking about what a good job she did.

'I only ever met Bill twice but Jeffrey had told me that they were good friends.

'I asked, "How come?" and he laughed and said, "He owes me some favours." Maybe he was just joking but it constantly surprised me that people with as much to lose as Bill and [Prince] Andrew weren't more careful.

'Bill must have known about Jeffrey's girls. There were three desks in the living area of the villa on the island.


Speaking out: Virginia, now aged 26, in her new home in Australia

'They were covered with pictures of Jeffrey shaking hands with famous people and photos of naked girls, including one of me that Jeffrey had at all his houses, lying in a hammock.

'We all dined together that night. Jeffrey was at the head of the table. Bill was at his left. I sat across from him. Emmy Tayler, Ghislaine's blonde British assistant, sat at my right.

'Ghislaine was at Bill's left and at the left of Ghislaine there were two olive-skinned brunettes who'd flown in with us from New York.

'I'd never met them before. I'd say they were no older than 17, very innocent-looking.

'They weren't there for me. They weren't there for Jeffrey or Ghislaine because I was there to have sex with Jeffrey on the trip.

'Maybe Jeffrey thought they would entertain Bill, but I saw no evidence that he was interested in them. He and Jeffrey and Ghislaine seemed to have a very good relationship. Bill was very funny.

'He made me laugh a few times. And he and Jeffrey and Ghislaine told blokey jokes and the brunettes listened politely and giggled.

'After dinner I gave Jeffrey an erotic massage. I don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.'

'Bill must have known about Jeffrey's girls. There were three desks in the living area of the villa on the island... covered with photos of naked girls'

According to prison records, when Epstein was serving his jail term, his visitors included a long-time – and highly controversial – Clinton acquaintance, Arnold Prosperi.

'In the final hours of the Clinton presidency, in January 2001, Prosperi was facing three years in prison after being convicted of tax fraud. Mr Clinton commuted his sentence to house arrest.

'Clinton, Prosperi and Epstein make an odd threesome on the face of it,' says a law enforcement source.

'Was Prosperi visiting Epstein as some kind of intermediary for Bill?

'Maybe Bill wanted to know if Epstein knew anything that could embarrass him. Or did Bill commute Prosperi's sentence as some kind of favour

for Epstein?'

Virginia disclosed that Mr Clinton's vice-president Al Gore and his wife, Tipper, were also guests of Epstein on his island.



Guests: Virginia says she also met former Vice President Al Gore, pictured right with Mr Clinton

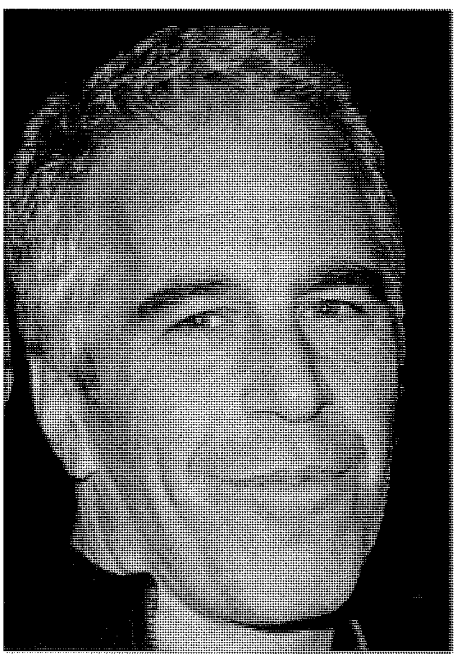
Last summer, the Gores abruptly announced that they were ending their supposedly fairytale marriage and, just weeks later, it emerged that Mr Gore – the famously sanctimonious global-warming disciple – had been accused of trying to force sex on a woman with whom he had booked a therapeutic massage at an Oregon hotel.

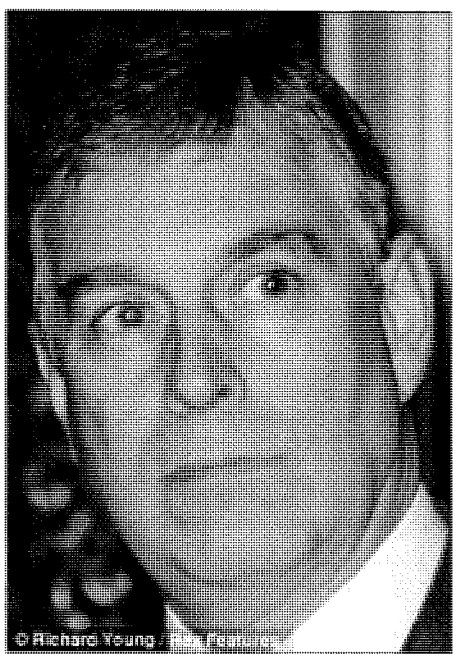
'I had no clue that anything was up,' Virginia says. 'The Gores seemed like a beautiful couple when I met them. All I knew was that Mr Gore was a friend of Jeffrey's and Ghislaine's. Jeffrey didn't ask me to give him a massage.

'There might have been a couple of other girls there on that trip but I could never have imagined this guy would do anything wrong. I was planning to vote for him when I turned 18. I thought he was awesome.'

Virginia said that yet another American liberal icon, President Obama's Middle East peace envoy Senator George Mitchell, frequently visited Epstein's New York residence.

Mr Mitchell, aged 77 – who previously led America's Northern Ireland peace initiative – 'was very close to Jeffrey,' Virginia recalled. 'He is very clean-cut. You wouldn't think of him being part of Jeffrey's crew.'





Scandal: U.S. authorities want to interview Jeffrey Epstein (left) and may wish to quiz his friend, Prince Andrew

Epstein's contacts book contains a work and a home telephone number for the senator.

Another acquaintance was Israel defence secretary Ehud Barak, whose spokesman told The Mail on Sunday: 'Mr Barak did attend several small functions in Mr Epstein's home in New York that were usually attended by leading businessman, university presidents, Nobel Prize Laureates and prominent public figures.'

Epstein's many Hollywood pals include Matt Groening, creator of The Simpsons.

'Jeffrey once had me give Matt a foot massage when he was flying on the jet with us,' Virginia says.

'He laughed and did drawings of Bart and Homer for my little brother and my dad.

'I also met Naomi Campbell at a birthday party of hers on a yacht in the South of France. She is a friend of Ghislaine's but she was a real bitch to me.

'She was very fake. She turned away from me when we were introduced by Ghislaine and Jeffrey.

'Donald Trump was also a good friend of Jeffrey's. He didn't partake in sex with any of us but he flirted with me. He'd laugh and tell Jeffrey, "You've got the life." '

Palm Beach Police say Epstein seemed utterly unfazed by the allegations against him when they began their long and detailed investigation.



'Jeffrey's crew: Middle East peace envoy George Mitchell, right, pictured with President Barack Obama and U.S. Secretary of State Hilary Clinton, frequently visited Epstein¿s New York residence, Virginia also claims

But he also took his defence very seriously indeed. Epstein engaged his friend, the Harvard law professor Alan Dershowitz – whose celebrity clients have included Mike Tyson, Patty Hearst, Claus von Bulow and O.J. Simpson – to run his legal defence.

He also employed a firm of private investigators to investigate the backgrounds of the girls.

Detectives painstakingly built a case which they believed showed that Epstein systematically paid teenage girls to recruit other teenage girls to his sex ring.

However, as the investigation continued, they found that Epstein's team had already spoken to key witnesses, suggesting that the financier would reward those who helped him.

In addition, Epstein's defence team agreed to the unusual move of suggesting that the alleged victims sue Epstein in the civil courts. The result was a plea bargain in which Epstein admitted a single charge of soliciting an underage girl for prostitution – a deal which infuriated many police officers who worked on the case.

More than 20 of Epstein's girls are said to have sued him for damages. At least 17 have settled out of court.

Mr Clinton, Mr Gore and Mr Mitchell were all contacted about their friendship with Epstein but declined to comment.

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Statement on Behalf of Ghislaine Maxwell

BY DEVONSHIRES SOLICITORS, PRNE
WEDNESDAY, MARCH 9, 2011

LONDON, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her
that have appeared recently in the media. These allegations are all entirely
false.

It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for
the allegations to be withdrawn have simply been ignored.

In the circumstances, Ms Maxwell is now proceeding to take legal action against those newspapers.

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get
in the way of a good story." However, the allegations made against me are
abhorrent and entirely untrue and I ask that they stop," said Ghislaine
Maxwell.

"A number of newspapers have shown a complete lack of accuracy
in their reporting of this story and a failure to carry out the most
elementary investigation or any real due diligence. I am now taking action to
clear my name," she said.

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Filed under: Government and Policy, Law, Media

Tags: Devonshires Solicitors, London, March 10, United Kingdom

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EXHIBIT D

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
______________________________/

JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21 FOR JOINDER IN ACTION

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as "the new victims"), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as "the current victims"). The new victims have suffered the same violations of their rights under the Crime Victims' Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may "at any time" add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.[1]

FACTUAL BACKGROUND

[1] As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

<u>Jane Doe #3's Circumstances</u>

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein. The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA. If allowed to join this action, Jane Doe #3 would prove the following:

In 1999, Jane Doe #3 was approached by Ghislaine Maxwell, one of the main women whom Epstein used to procure under-aged girls for sexual activities and a primary co-conspirator in his sexual abuse and sex trafficking scheme. In fact, it became known to the government that Maxwell herself regularly participated in Epstein's sexual exploitation of minors, including Jane Doe #3. Maxwell persuaded Jane Doe #3 (who was then fifteen years old) to come to Epstein's mansion in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children (including Jane Doe #1 and Jane Doe #2). When Jane Doe #3 began giving Epstein a "massage," Epstein and Maxwell turned it into a sexual encounter, as they had done with many other victims. Epstein then became enamored with Jane Doe #3, and with the assistance of Maxwell converted her into what is commonly referred to as a "sex slave." Epstein kept Jane Doe #3 as his sex slave from about 1999 through 2002, when she managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years. From 1999 through 2002, Epstein frequently sexually abused Jane Doe #3, not only in West Palm Beach, but also in New York, New Mexico, the U.S. Virgin Islands, in international airspace on his Epstein's private planes, and elsewhere.

Epstein also sexually trafficked the then-minor Jane Doe, making her available for sex to politically-connected and financially-powerful people. Epstein's purposes in "lending" Jane Doe (along with other young girls) to such powerful people were to ingratiate himself with them for

business, personal, political, and financial gain, as well as to obtain potential blackmail information.

One such powerful individual that Epstein forced then-minor Jane Doe #3 to have sexual relations with was former Harvard Law Professor Alan Dershowitz, a close friend of Epstein's and well-known criminal defense attorney. Epstein required Jane Doe #3 to have sexual relations with Dershowitz on numerous occasions while she was a minor, not only in Florida but also on private planes, in New York, New Mexico, and the U.S. Virgin Islands. In addition to being a participant in the abuse of Jane Doe #3 and other minors, Deshowitz was an eye-witness to the sexual abuse of many other minors by Epstein and several of Epstein's co-conspirators. Dershowitz would later play a significant role in negotiating the NPA on Epstein's behalf. Indeed, Dershowitz helped negotiate an agreement that provided immunity from federal prosecution in the Southern District of Florida not only to Epstein, but also to "any potential co-conspirators of Epstein." NPA at 5. Thus, Dershowitz helped negotiate an agreement with a provision that provided protection for himself against criminal prosecution in Florida for sexually abusing Jane Doe #3. Because this broad immunity would have been controversial if disclosed, Dershowitz (along with other members of Epstein's defense team) and the Government tried to keep the immunity provision secret from all of Epstein's victims and the general public, even though such secrecy violated the Crime Victims' Rights Act.

Ghislaine Maxwell was another person in Epstein's inner circle and a co-conspirator in Epstein's sexual abuse. She was someone who consequently also appreciated the immunity granted by the NPA for the crimes she committed in Florida. In addition to participating in the sexual abuse of Jane Doe #3 and others, Maxwell also took numerous sexually explicit pictures

of underage girls involved in sexual activities, including Jane Doe #3. She shared these photographs (which constituted child pornography under applicable federal laws) with Epstein. The Government is apparently aware of, and in certain instances possesses some of these photographs.

Perhaps even more important to her role in Epstein's sexual abuse ring, Maxwell had direct connections to other powerful individuals with whom she could connect Epstein. For instance, one such powerful individual Epstein forced Jane Doe #3 to have sexual relations with was a member of the British Royal Family, Prince Andrew (a/k/a Duke of York). Jane Doe #3 was forced to have sexual relations with this Prince when she was a minor in three separate geographical locations: in London (at Ghislaine Maxwell's apartment), in New York, and on Epstein's private island in the U.S. Virgin Islands (in an orgy with numerous other under-aged girls). Epstein instructed Jane Doe #3 that she was to give the Prince whatever he demanded and required Jane Doe #3 to report back to him on the details of the sexual abuse. Maxwell facilitated Prince Andrew's acts of sexual abuse by acting as a "madame" for Epstein, thereby assisting in internationally trafficking Jane Doe #3 (and numerous other young girls) for sexual purposes.

Another person in Epstein's inner circle of friends (who becomes apparent with almost no investigative effort) is Jean Luc Brunel. Epstein sexually trafficked Jane Doe #3 to Jean Luc Brunel many times. Brunel was another of Epstein's closest friends and a regular traveling companion, who had many contacts with young girls throughout the world. Brunel has been a model scout for various modeling agencies for many years and apparently was able to get U.S. passports for young girls to "work" as models. He would bring young girls (ranging to ages as

young as twelve) to the United States for sexual purposes and farm them out to his friends, especially Epstein. Brunel would offer the girls "modeling" jobs. Many of the girls came from poor countries or impoverished backgrounds, and he lured them in with a promise of making good money. Epstein forced Jane Doe #3 to observe him, Brunel and Maxwell engage in illegal sexual acts with dozens of underage girls. Epstein also forced Jane Doe #3 to have sex with Brunel on numerous occasions, at places including Epstein's mansion in West Palm Beach, Little St. James Island in the U.S. Virgin Islands (many including orgies that were comprised of other underage girls), New York City, New Mexico, Paris, the south of France, and California.

Epstein also trafficked Jane Doe #3 for sexual purposes to many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders. Epstein required Jane Doe #3 to describe the events that she had with these men so that he could potentially blackmail them.

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3's relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make $300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. *See* 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. *See, e.g.*, DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.*, DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.*, DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. *See* DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.[2] Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

[2] Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: January 2, 2015

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I certify that the foregoing document was served on January 2, 2015, on the following using the Court's CM/ECF system:

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EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CASE NO.:08-CV-80736-KAM

JANE DOE 1 and JANE DOE 2,

Petitioners,

vs.

UNITED STATES OF AMERICA,

Respondent.

_________________________________/

ORDER DENYING PETITIONERS' MOTION TO JOIN UNDER RULE 21 AND MOTION TO AMEND UNDER RULE 15

This cause is before the Court on Jane Doe 3 and Jane Doe 4's Corrected Motion Pursuant to Rule 21 for Joinder in Action ("Rule 21 Motion") (DE 280), and Jane Doe 1 and Jane Doe 2's Protective Motion Pursuant to Rule 15 to Amend Their Pleadings to Conform to Existing Evidence and to Add Jane Doe 3 and Jane Doe 4 as Petitioners ("Rule 15 Motion") (DE 311). Both motions are ripe for review. For the following reasons, the Court concludes that they should be denied.

I. Background

This is an action by two unnamed petitioners, Jane Doe 1 and Jane Doe 2, seeking to prosecute a claim under the Crime Victims' Rights Act (CVRA), 18 U.S.C. § 3771. (DE 1). Generally, they allege that the respondent Government violated their rights under the CVRA by failing to consult with them before negotiating a non-prosecution agreement with Jeffrey Epstein, who subjected them to various sexual crimes while they were minors. (Id.). Petitioners initiated this action in July 2008. (Id.).

On December 30, 2014, two other unnamed victims, Jane Doe 3 and Jane Doe 4, moved to join as petitioners in this action pursuant to Federal Rule of Civil Procedure 21. (DE 280). Petitioners (Jane Doe 1 and Jane Doe 2) support the Rule 21 Motion. (Id. at 11). Jane Doe 3 and Jane Doe 4 argue that they "have suffered the same violations of their rights under the [CVRA] as the" Petitioners, and they "desire to join in this action to vindicate their rights as well." (Id. at 1). The Government vehemently opposes joinder under Rule 21. (DE 290). The Government argues that Rule 15 is the proper procedural device for adding parties to an action, not Rule 21. (Id. at 1).

"[O]ut of an abundance of caution," Petitioners filed a motion to amend their petition under Rule 15, conforming the petition to the evidence and adding Jane Doe 3 and Jane Doe 4 as petitioners. (DE 311 at 2). The Government opposes the Rule 15 Motion as well. (DE 314). Among other things, the Government argues that amending the petition to include Jane Doe 3 and Jane Doe 4 should be denied because of their undue delay in seeking to join the proceedings, and the undue prejudice that amendment will cause. (Id.).

After considering the parties' submissions and the proposed amended petition, the Court finds that justice does not require amendment in this instance and exercises its discretion to deny the amendment.

II. Discussion

"The decision whether to grant leave to amend a complaint is within the sole discretion of the district court." Laurie v. Ala. Ct. Crim. Apps., 256 F.3d 1266, 1274 (11th Cir. 2001). "The court should freely give leave when justice so requires." Fed. R. Civ. P. 15(a)(2). Justice does not require amendment in several instances, "includ[ing] undue delay, bad faith, dilatory motive

on the part of the movant, . . . undue prejudice to the opposing party by virtue of allowance of the amendment, [and] futility of amendment.'" Laurie, 256 F.3d at 1274 (quoting Foman v. Davis, 371 U.S. 178, 182 (1962)). In addition to considering the effect of amendment on the parties, the court must consider "the importance of the amendment on the proper determination of the merits of a dispute." 6 Wright & Miller, Fed. Prac. & Fed. P. § 1488, p. 814 (3d ed. 2010). Justice does not require amendment where the addition of parties with duplicative claims will not materially advance the resolution of the litigation on the merits. See Herring v. Delta Air Lines, Inc., 894 F.2d 1020, 1024 (9th Cir. 1989).

A. Rule 21 Motion

Jane Doe 3 and Jane Doe 4's first attempt to join in this proceeding was brought under Rule 21. (DE 280). "If parties seek to add a party under Rule 21, courts generally use the standard of Rule 15, governing amendments to pleadings, to determine whether to allow the addition." 12 Wright & Miller, Fed. Prac. & Fed. P., p. 432 (3d ed. 2013); see also Galustian v. Peter, 591 F.3d 724, 729-30 (4th Cir. 2010) (collecting cases and noting that Rule 15(a) applies to amendments seeking to add parties); Frank v. U.S. West, Inc., 3 F.3d 1357, 1365 (10th Cir. 1993) ("A motion to add a party is governed by Fed. R. Civ. P. 15(a) . . . .").

Rule 21, "Misjoinder and Non-joinder of Parties," provides the court with a tool for correcting the "misjoinder" of parties that would otherwise result in dismissal. Fed. R. Civ. P. 21. Insofar as Rule 21 "relates to the addition of parties, it is intended to permit the bringing in of a person, who through inadvertence, mistake or for some other reason, had not been made a party and whose presence as a party is later found necessary or desirable." United States v. Com. Bank of N. Am., 31 F.R.D. 133, 135 (S.D.N.Y. 1962) (internal quotation marks omitted).

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In their Rule 21 Motion, Jane Doe 3 and Jane Doe 4 do not claim that they were omitted from this proceeding due to any "inadvertence" or "mistake" by Petitioners; rather, they seek to join this proceeding as parties that could have been permissively joined in the original petition under Rule 20 ("Permissive Joinder of Parties"). As courts generally use the standards of Rule 15 to evaluate such circumstances, the Court will consider the joinder issue as presented in the Rule 15 Motion.[1] The Court will consider the arguments presented in the Rule 21 Motion as if they are set forth in the Rule 15 Motion as well. Because the arguments are presented in the Rule 15 Motion (and because the Court is denying the Rule 15 Motion on its merits, as discussed below), the Rule 21 Motion will be denied.

The Court also concludes that portions of the Rule 21 Motion and related filings should be stricken from the record. Pending for this Court's consideration is a Motion for Limited Intervention filed by Alan M. Dershowitz, who seeks to intervene to "strike the outrageous and impertinent allegations made against him and [to] request[] a show cause order to the attorneys that have made them." (DE 282 at 1). The Court has considered Mr. Dershowitz's arguments, but it finds that his intervention is unnecessary as Federal Rule of Civil Procedure 12(f) empowers the Court "on its own" to "strike from a pleading an insufficient defense or any redundant, immaterial, impertinent, or scandalous matter." Fed. R. Civ. P. 12(f).

Petitioners' Rule 21 Motion consists of relatively little argumentation regarding why the Court should permit them to join in this action: they argue that (1) they were sexually abused by

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[1] The Court notes that, regardless of which motion it considers, the same standard governs the addition of parties under Rule 21 and Rule 15. See Goston v. Potter, No. 08-cv-478 FJS ATB, 2010 WL 4774238, at *5 (N.D.N.Y. 2010) (citing Bridgeport Music, Inc. v. Universal Music Grp., Inc., 248 F.R.D. 408, 412 (S.D.N.Y. 2008)).

Jeffrey Epstein, and (2) the Government violated their CVRA rights by concealing the non-prosecution agreement with them. (DE 280 at 3; see id. at 7-8). However, the bulk of the Rule 21 Motion consists of copious factual details that Jane Doe 3 and Jane Doe 4 "would prove" "[i]f allowed to join this action." (Id. at 3, 7). Specifically, Jane Doe 3 proffers that she could prove the circumstances under which a non-party introduced her to Mr. Epstein, and how Mr. Epstein sexually trafficked her to several high-profile non-party individuals, "including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders." (Id. at 3-6). She names several individuals, and she offers details about the type of sex acts performed and where they took place. (See id. at 5).[2]

At this juncture in the proceedings, these lurid details are unnecessary to the determination of whether Jane Doe 3 and Jane Doe 4 should be permitted to join Petitioners' claim that the Government violated their rights under the CVRA. The factual details regarding with whom and where the Jane Does engaged in sexual activities are immaterial and impertinent to this central claim (i.e., that they were known victims of Mr. Epstein and the Government owed them CVRA duties), especially considering that these details involve non-parties who are not related to the respondent Government. These unnecessary details shall be stricken.

The original Rule 21 Motion (DE 279) shall be stricken in its entirety, as it is wholly superseded by the "corrected" version of the Rule 21 Motion (DE 280). From the corrected Rule 21 Motion, the Court shall strike all factual details regarding Jane Doe 3 between the following sentences: "The Government then concealed from Jane Doe #3 the existence of its NPA from

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[2] Jane Doe 4's proffer is limited to sexual acts between Mr. Epstein and herself. (See DE 280 at 7-8).

Jane Doe #3, in violation of her rights under the CVRA" (id. at 3); and "The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA" (id. at 6). As none of Jane Doe 4's factual details relate to non-parties, the Court finds it unnecessary to strike the portion of the Rule 21 Motion related to her circumstances. Regarding the Declaration in support of Petitioners' response to Mr. Dershowitz's motion to intervene (DE 291-1), the Court shall strike paragraphs 4, 5, 7, 11, 13, 15, 19 through 53, and 59, as they contain impertinent details regarding non-parties. Regarding the Declaration of Jane Doe 3 in support of the Rule 21 Motion (DE 310-1), the Court shall strike paragraphs 7 through 12, 16, 39, and 49, as they contain impertinent details regarding non-parties. Jane Doe 3 is free to reassert these factual details through proper evidentiary proof, should Petitioners demonstrate a good faith basis for believing that such details are pertinent to a matter presented for the Court's consideration.

As mentioned, Mr. Dershowitz moves to intervene "for the limited purposes of moving to strike the outrageous and impertinent allegations made against him and requesting a show cause order to the attorneys that have made them." (DE 282 at 1). As the Court has taken it upon itself to strike the impertinent factual details from the Rule 21 Motion and related filings, the Court concludes that Mr. Derschowitz's intervention in this case is unnecessary. Accordingly, his motion to intervene will be denied as moot.[3] Regarding whether a show cause order should

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[3] This also moots Mr. Dershowitz's Motion for Leave to File Supplemental Reply in Support of Motion for Limited Intervention. (DE 317). Denying Mr. Dershowitz's motion to intervene also renders moot Petitioners' motion (DE 292) to file a sealed document supporting its response to Mr. Dershowitz's motion. It will accordingly be denied as moot, and DE 293 (the sealed response) will be stricken from the record.

issue, the Court finds that its action of striking the lurid details from Petitioners' submissions is sanction enough. However, the Court cautions that all counsel are subject to Rule 11's mandate that all submissions be presented for a proper purpose and factual contentions have evidentiary support, Fed. R. Civ. P. 11(b)(1) and (3), and that the Court may, on its own, strike from any pleading "any redundant, immaterial, impertinent, or scandalous matter," Fed. R. Civ. P. 12(f).

B. Rule 15 Motion

Between their two motions (the Rule 21 Motion and Rule 15 Motion), Jane Doe 3 and Jane Doe 4 assert that "they desire to join in this action to vindicate their rights [under the CVRA] as well." (DE 280 at 1). Although Petitioners already seek the invalidation of Mr. Epstein's non-prosecution agreement on behalf of all "other similarly-situated victims" (DE 189 at 1; DE 311 at 2, 12, 15, 18-19), Jane Doe 3 and Jane Doe 4 argue that they should be fellow travelers in this pursuit, lest they "be forced to file a separate suit raising their claims" resulting in "duplicative litigation" (DE 280 at 11). The Court finds that justice does not require adding new parties this late in the proceedings who will raise claims that are admittedly "duplicative" of the claims already presented by Petitioners.

The Does' submissions demonstrate that it is entirely unnecessary for Jane Doe 3 and Jane Doe 4 to proceed as parties in this action, rather than as fact witnesses available to offer relevant, admissible, and non-cumulative testimony. (See, e.g., DE 280 at 2 (Jane Doe 3 and Jane Doe 4 "are in many respects similarly situated to the current victims"), 9 ("The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims."), 10 (Jane Doe 3 and Jane Doe 4 "will simply join in motions that the current victims were going to file in any event."), 11 (litigating Jane Doe 3 and

Jane Doe 4's claims would be "duplicative"); DE 298 at 1 n.1 ("As promised . . . Jane Doe No. 3 and Jane Doe No. 4 do not seek to expand the number of pleadings filed in this case. If allowed to join this action, they would simply support the pleadings already being filed by Jane Doe No. 1 and Jane Doe No. 2."); DE 311 at 5 n.3 ("[A]ll four victims (represented by the same legal counsel) intend to coordinate efforts and avoid duplicative pleadings."), 15 (Jane Doe 3 and Jane Doe 4 "challenge the same secret agreement i.e., the NPA that the Government executed with Epstein and then concealed from the victims. This is made clear by the proposed amendment itself, in which all four victims simply allege the same general facts.")). As the Does argue at length in their Rule 15 Motion, Jane Doe 1's original petition "specifically allege[s] that the Government was violating not only her rights but the rights of other similarly-situated victims." (DE 311 at 2). The Court fails to see why the addition of "other similarly-situated victims" is now necessary to "vindicate their rights as well." (DE 280 at 1).

Of course, Jane Doe 3 and Jane Doe 4 can participate in this litigated effort to vindicate the rights of similarly situated victims there is no requirement that the evidentiary proof submitted in this case come only from the named parties. Petitioners point out as much, noting that, regardless of whether this Court grants the Rule 15 Motion, "they will call Jane Doe No. 3 as a witness at any trial." (DE 311 at 17 n.7). The necessary "participation" of Jane Doe 3 and Jane Doe 4 in this case can be satisfied by offering their properly supported and relevant, admissible, and non-cumulative testimony as needed, whether through testimony at trial (see DE 280 at 9) or affidavits submitted to support the relevancy of discovery requests[4] (see

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[4] The non-party Jane Does clearly understand how to submit affidavits. (See DEs 291-1, 310-1).

id. at 10). Petitioners do not contend that Jane Doe 3 and Jane Doe 4's "participation in this case" can only be achieved by listing them as parties.

As it stands under the original petition, the merits of this case will be decided based on a determination of whether the Government violated the rights of Jane Doe 1, Jane Doe 2, and all "other similarly situated victims" under the CVRA. Jane Doe 3 and Jane Doe 4 may offer relevant, admissible, and non-cumulative evidence that advances that determination, but their participation as listed parties is not necessary in that regard. See Herring, 894 F.2d at 1024 (District court did not abuse its discretion by denying amendment where "addition of more plaintiffs . . . would not have affected the issues underlying the grant of summary judgment."); cf. Arthur v. Stern, 2008 WL 2620116, at *7 (S.D. Tex. 2008) (Under Rule 15, "courts have held that leave to amend to assert a claim already at issue in [another lawsuit] should not be granted if the same parties are involved, the same substantive claim is raised, and the same relief is sought.").[5] And, as to Jane Doe 4 at least, adding her as a party raises unnecessary questions about whether she is a proper party to this action.[6]

Petitioners also admit that amending the petition to conform to the evidence by including references to the non-prosecution agreement itself is "unnecessary" as the "existing petition is broad enough to cover the developing evidence in this case." (DE 311). The Court

[5] The Court expresses no opinion at this time whether any of the attestations made by Jane Doe 3 and Jane Doe 4 in support of their motion will be relevant, admissible, and non-cumulative.

[6] The Government contends that Jane Doe 4 is not a true "victim" in this case because she was not known at the time the Government negotiated the non-prosecution agreement, and accordingly she was not entitled to notification rights under the CVRA. (See DE 290 at 10). Any "duplicative" litigation filed by Jane Doe 4 would necessarily raise the issue of whether she has standing under the CVRA under these circumstances.

agrees, and it concludes that justice does not require amending the petition this late in the proceedings.

III. Conclusion

Accordingly, it is hereby **ORDERED AND ADJUDGED** as follows: the Rule 21 Motion (DE 280) is **DENIED**; the Rule 15 Motion (DE 311) is **DENIED**; Intervenor Dershowitz's Motion for Limited Intervention (DE 282) and Motion for Leave to File Supplemental Reply in Support of Motion for Limited Intervention (DE 317) are **DENIED AS MOOT**; Petitioners' Motion to Seal (DE 292) is **DENIED AS MOOT**; the following materials are hereby **STRICKEN** from the record:

- DE 279, in its entirety.
- DE 280, all sentences between the following sentences: "The Government then concealed from Jane Doe #3 the existence of its NPA from Jane Doe #3, in violation of her rights under the CVRA" (DE 280 at 3); and "The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA" (DE 280 at 6).
- DE 291-1, paragraphs 4, 5, 7, 11, 13, 15, 19 through 53, and 59.
- DE 310-1, paragraphs 7 through 12, 16, 39, and 49.
- DE 293, in its entirety.

DONE AND ORDERED in chambers at West Palm Beach, Palm Beach County, Florida, this 6th day of April, 2015.

KENNETH A. MARRA
United States District Judge

EXHIBIT F

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

EXHIBIT G

1 IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
2
3 Claim No. CR 2016-624
4 BETWEEN:
5 VIRGINIA L. GIUFFRE
Applicant,
6 - and -
7 ROSS GOW,
8 Respondent.
9 AND:
10 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
11
12 Virginia L. Giuffre,)
Plaintiff,)
13)
v.) Case No. 15-cv-07433-RWS
14)
Ghislaine Maxwell,)
15 Defendant.)
16 --
17 Friday, November 18, 2016
18 AT: 8:27 a.m.
19 Taken at:
20
21 Essex Chambers 29,
81 Chancery Lane,
22 London, UK, WC2A 1DD
23
24 Court Reporter: Lisa Barrett, Accredited Real-time
Reporter
25

1 A P P E A R A N C E S:

2

3 Appearing for the Plaintiff:

4 MEREDITH L. SCHULTZ, ESQ.
BOIES, SCHILLER & FLEXNER, LLP
5 401 East Las Olas Boulevard, Suite 1200
Fort Lauderdale, FL 33301
6

7 DAVID TURNER, ESQ.
BOIES, SCHILLER & FLEXNER (UK) LLP
8 25 Old Broad Street
London, UK EC2N 1HQ
9

10 Counsel for Defendant, Ghislaine Maxwell:

11 LAURA A. MENNIGER, P.C.
HADDON, MORGAN and FOREMAN, P.C.
12 150 East Tenth Avenue
Denver, CO 80203
13

14 Counsel for Defendant, Ross Neil Sutherland Gow
(witness):
15

16 RICHARD SPEARMAN, Q.C.
PHILIP BARDEN,
17 DEVONSHIRES SOLICITORS LLP
30 Finsbury Circus, London
18 EC2M 7DT, UK

19

20 Examiner:

21 ALLEN DYER,
4 Pump Court
22 Temple, London, EC4Y 7AN
DX 303 LDE
23

24

25

1 W I T N E S S I N D E X

8 E X H I B I T I N D E X

1 E X H I B I T I N D E X

1 E X H I B I T I N D E X

1 E X H I B I T I N D E X

	No.	Description	Page
2			
3	14	Email chain, latest in time from	68
4		Nick Sommerlad, dated 2 January 2015,	
5		21:45, To ross@acuityreputation.com	
6		Bates Nos. RG(UK)_ 000004, one page	
7	15	Email from Ross Gow dated Saturday,	71
8		3 January 2015, To David Mercer, Bates Nos.	
9		RG(UK)_000005-08	
10	16	Email string from Ross Gow to G Max;	73
11		Philip Barden, dated Tues,	
12		February 24, 2015, Bates Nos.	
13		GM_00577 - one page	
14	17	Email from G Maxwell to Ross Gow,	75
15		dated Thurs February 26, 2015,	
16		Bates Nos. GM_00578	
17	18	Email from Ross Gow to G Maxwell,	77
18		dated Thursday, February 26, 2015,	
19		Bates Nos. GM_00579	
20	19	Email from Ross Gow to G Max;	78
21		Philip Barden, dated Wednesday,	
22		April 8, 2015, Bates Nos. GM_00580	
23			
24			
25			

1 E X H I B I T I N D E X

1 P R O C E E D I N G S
2 THE VIDEOGRAPHER: Here begins video card
3 number 1, volume I, in the video deposition of Ross Gow.
4 This is taken in the matter of Virgina Guiffre
5 and Ross Gow. This is being heard in the High Court of
6 Justice, Queen's Bench Division, Senior Master, claim
7 number CR-21016-624.
8 Today's date is November 18, 2016. The time on
9 the video screen is 08:26 a.m., local time in London.
10 The video operator today is Phillip Hill from
11 DTI Court Reporting Solutions.
12 The court reporter is Lisa Barrett from DTI
13 Court Reporting Solutions.
14 This video deposition is taking place at the
15 Essex Chambers in London.
16 I will now hand over the proceedings to the
17 Examiner. Thank you, sir.
18 MR. DYER: Would counsel or lawyers present,
19 please identify themselves for the record, first?
20 MS. SCHULTZ: I'm Meredith Schultz from Boise
21 Schiller and Flexner LLP, appearing for the Plaintiff,
22 Ms. Virginia Guiffre. With me is my colleague, David
23 Turner, also from Boies, Schiller and Flexner LLP.
24 MS. MENNINGER: I'm Laura Menninger from
25 Haddon, Morgan and Foreman on behalf of Ghislaine

1 worse objection, or worse grounds for me. 08:56:26
2 MR. DYER: I think questions of payment do not 08:56:28
3 fall within the scope. 08:56:30
4 BY MS. SCHULTZ: 08:56:38
5 Q. Okay. Are you currently retained by Ms. 08:56:38
6 Maxwell for professional services. 08:56:39
7 A. If I could go back to my previous answer, Ms. 08:56:42
8 Maxwell is a project client, and it's on a day rate. If 08:56:46
9 -- so, for the sake of argument between 2nd of 08:56:55
10 January 2015 and the 1st of February 2016 we were quite 08:56:57
11 busy answering these incoming calls, so there was quite a 08:57:03
12 lot of work at that point in time. Recently there's been 08:57:06
13 no work. There's been no need because the press activity 08:57:08
14 has died down, our function is somewhat redundant. 08:57:12
15 Q. Can you estimate the last time that you worked 08:57:15
16 on this account at your day rate? 08:57:17
17 A. It would have been in 2015. Probably April, 08:57:30
18 May, something like that. No invoices, no -- no payment 08:57:35
19 in 2016 from my recollection. 08:57:41
20 BY MS. SCHULTZ: 08:57:47
21 Q. Mr. Gow, I'm going to hand you another 08:57:47
22 document. 08:57:49
23 (Exhibit 3 was marked for identification.) 08:30:48
24 MS. SCHULTZ: Point of procedure: I have only 08:58:09
25 three copies of these documents for each of the 08:58:11

1	remaining, so...	08:58:14
2	I've marked as Exhibit 3 RG(UK)_00002. Do you	08:58:15
3	recognize this email?	08:58:47
4	A. I do.	08:58:48
5	Q. Did you receive this email?	08:58:49
6	A. I did, on the -- on New Year's Day 2015.	08:58:50
7	Q. Did you contact Ms. Maxwell after receiving	08:58:57
8	this email?	08:58:58
9	A. I did.	08:58:59
10	Q. Did you make any response to Mr. Ball in any	08:59:19
11	form?	08:59:22
12	A. I did.	08:59:22
13	Q. Can you tell me what you -- what response you	08:59:25
14	made?	08:59:26
15	A. Well, the response to Mr. Ball was part of a	08:59:27
16	series of responses having spoken to my client within 24	08:59:33
17	hours or so, we got back to Mr. Ball with an agreed	08:59:41
18	statement which went out to a number of media.	08:59:44
19	Q. When you say "agreed statement" can you tell me	08:59:50
20	more about what you mean? Who agreed to the statement?	08:59:52
21	A. I need to give you some context, if I may,	08:59:58
22	about that statement.	09:00:01
23	So, this is on New Year's Day. I was	09:00:02
24	in France so the email time here of 21:46, in French	09:00:04
25	time was 22:46, and I was getting up early the next	09:00:10

1 morning to drive my family back from the south of 09:00:14
2 France to England, which is a 14-hour journey, door to 09:00:17
3 door. So on the morning of the 2nd of January, 09:00:22
4 bearing in mind that Ms. Maxwell, I think was in New 09:00:26
5 York then, she was five hours behind, so there was 09:00:28
6 quite a lot of, sort of time difference between the 09:00:30
7 various countries here, I sent her an email, I 09:00:35
8 believe, saying -- parsing this -- forwarding this 09:00:38
9 email to her saying "How do you wish to proceed?" And 09:00:41
10 then I was on the telephone -- I had two telephones in 09:00:45
11 the car, I received in excess of 30 phone calls from 09:00:50
12 various media outlets on the 2nd of January, all 09:00:54
13 asking for information about how Ms. Maxwell was 09:01:00
14 looking to respond to the latest court filings, which 09:01:04
15 were filed on the 30th of December as I understand. 09:01:10
16 And by close -- towards close of play 09:01:13
17 on the 2nd, I received an email forwarded by 09:01:16
18 Ms. Maxwell, containing a draft statement which my 09:01:33
19 understanding was the majority of which had been 09:01:36
20 drafted by Mr. Barden with a header along the lines of 09:01:39
21 "This is the agreed statement." At close of play on 09:01:44
22 the 2nd. 09:01:48
23 So I -- I was -- I had gone under the 09:01:50
24 Channel Tunnel and I was sitting on the other side and 09:01:54
25 that email, which my understanding was that it had 09:01:57

1 been signed off by the client, effectively, was then 09:02:01
2 sent out to a number of media, including Mr. Ball and 09:02:05
3 various other UK newspapers. 09:02:09
4 Q. Mr. Gow, when you say "end of play" and "close 09:02:12
5 of play," are you referring to sending the email that's 09:02:15
6 Exhibit 2? 09:02:18
7 A. Yes, I am. 09:02:24
8 MR. DYER: My understanding is that it went to 09:02:29
9 people other than those listed? 09:02:30
10 THE WITNESS: Yes, that is -- 09:02:32
11 MR. DYER: Just a sample. 09:02:34
12 THE WITNESS: That is a sample. Everyone who 09:02:35
13 effectively -- well, the detail on this, I was driving, 09:02:37
14 so my eldest son in the back had my BlackBerry and was 09:02:40
15 trying to capture -- it was a pretty chaotic day. 09:02:43
16 Most people in the UK were on holiday. In fact, 09:02:48
17 it was a holiday weekend, our office was closed, my PA was 09:02:50
18 on holiday, so my son was basically doing an internship in 09:02:54
19 the back of the car, downloading the names of the callers 09:02:58
20 from various media outlets and -- so we had a list of 09:03:02
21 those so when I got to the car park, at the end of the 09:03:05
22 Eurotunnel thing in the UK, I had numerous names, so the 09:03:09
23 email went out to a wide range of people. 09:03:14
24 But the 30 or so calls I had is an aggregate 09:03:17
25 number, so there might have been five calls from the BBC 09:03:20

1 from different people so they -- the BBC would only write 09:03:24
2 one story, there wouldn't be five versions of it, so 30 is 09:03:27
3 an aggregate number. 09:03:31
4 BY MS. SCHULTZ: 09:03:34
5 Q. Okay. Looking again at Exhibit 2, could you 09:03:35
6 please review the individuals or email addresses of 09:03:37
7 the -- listed in the "To" and "bcc" portion? 09:03:41
8 A. Yep. 09:03:50
9 Q. Did you send this written statement to any 09:03:51
10 other individuals or entities who are not listed in that 09:03:53
11 portion? 09:03:57
12 A. Within -- within 24 hours of this, yes, a wider 09:03:58
13 range of people, definitely. 09:04:03
14 This was the initial -- these are the 09:04:05
15 most pressing ones, who said they were going to write 09:04:07
16 a story whether they had -- if I could just explain a 09:04:10
17 bit more context again in the world of PR. When you 09:04:13
18 are in the field you're engaged and you've just -- 09:04:16
19 you've got to prioritize who you spoke to and whoever 09:04:19
20 shouts the loudest usually gets responded to first. 09:04:22
21 So the reason there are two BBC people 09:04:25
22 there for instance, is there's BBC broadcast radio, 09:04:27
23 and BBC TV, and they were coming at -- from different 09:04:30
24 angles for different stories, but there was a certain 09:04:35
25 sense of urgency and immediacy. So the half a dozen 09:04:38

1 or so here were the ones that we prioritized to deal 09:04:44
2 with that night because they were publishing the next 09:04:46
3 day or -- or thereabouts, but for instance we also 09:04:49
4 spoke to the Daily Express. I can't remember the name 09:04:52
5 of the gentleman there, or the lady, but I remember 09:04:56
6 that was early the next morning when we got on to 09:04:58
7 other channels. 09:05:04
8 Q. So you sent this statement to additional 09:05:06
9 individuals on January 3rd? 09:05:09
10 A. Not just on January 3rd. I mean, as we had an 09:05:13
11 agreed statement there, and I do recall there is a typo 09:05:16
12 in this which is "Virginia" and "Victoria" -- there was a 09:05:20
13 transposition there. So the original email went out with 09:05:24
14 the typo because that was taken from the -- the statement 09:05:28
15 that I believe Mr. Barden was broadly the architect of, 09:05:35
16 but forwarded by Ms. Maxwell. So I just -- I took that 09:05:42
17 as a verbatim statement and sent it out. I re-read it in 09:05:45
18 the calm light of day the next morning. There was at 09:05:50
19 least one typo in it so I changed that and reached out, 09:05:52
20 again, to these people, updating the typo and sent it out 09:05:57
21 to additional people. 09:06:07
22 BY MS. SCHULTZ: 09:06:09
23 Q. Mr. Gow, I'm going to hand you another 09:06:15
24 document. I'm going to mark this as Exhibit 4. 09:06:17
25 (Exhibit 4 was marked for identification.) 09:06:26

1	BY MS. SCHULTZ:	09:06:28
2	Q. This is a document that is Bates labeled	09:06:31
3	GM_01043.	09:06:34
4	A. Thank you.	09:06:38
5	Q. The top email on this document says "From: Ross	09:06:59
6	Gow." Did you send this email?	09:07:02
7	A. I believe I did, yes.	09:07:07
8	Q. Did you send it to Ms. Maxwell?	09:07:08
9	A. Yes.	09:07:09
10	Q. In the "To" field, when it says "G Max," do you	09:07:11
11	recognize that to be Ms. Maxwell's email address?	09:07:18
12	A. Yes.	09:07:23
13	Q. In the second paragraph of this email it	09:07:37
14	states:	09:07:39
15	"Please advise how you wish to handle this." [As	09:07:40
16	read]	09:07:43
17	Did you receive a response from Ms. Maxwell?	09:07:43
18	A. Bearing in mind I was driving all that day, I	09:07:47
19	can't recall what the exact response was but from memory,	09:07:52
20	it was along the lines of she would get back to me with	09:07:57
21	how she wished to proceed.	09:08:03
22	BY MS. SCHULTZ:	09:08:04
23	Q. Okay.	09:08:25
24	Mr. Gow, I'm going to hand you another	09:08:26
25	document. I'm going to mark it as Exhibit 5.	09:08:27

1 had existing authorization to make statements on 11:39:08
2 Ms. Maxwell's behalf due to the reauthorization 11:39:11
3 letter; is that correct? 11:39:14
4 A. I believe that from the 2nd of January 2015, 11:39:15
5 I had an ongoing re-established authority to represent 11:39:20
6 her, within the parameters of the 2011, 2015 press 11:39:23
7 releases, there or thereabouts. 11:39:30
8 MS. SCHULTZ: Mr. Dyer, I have no further 11:39:35
9 questions. 11:39:36
10 MR. DYER: Thank you. That concludes your 11:39:38
11 deposition. 11:39:39
12 THE WITNESS: Thank you, sir. 11:39:40
13 MR. DYER: Thank you very much. 11:39:41
14 THE VIDEOGRAPHER: Going off the record, the
15 time is 11:39. End of video card number 3, volume I, and
16 end of the video deposition of Ross Gow.
17 (Whereupon, the deposition concluded at 11:39
18 a.m.)
19
20 [signature]
21 ______________________________
22 Lisa Barrett, RPR, CRR, CRC, CSR
23 Certified Real-time Court Reporter
24
25

1 Subscribed and sworn to before me this
2 20th day of November, 2016.
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1 CERTIFICATE OF DEPONENT
2
3 I, ROSS NEIL SUTHERLAND GOW, hereby certify that I
4 have read the foregoing pages, numbered 1 through 122
5 of my deposition of testimony taken in these
6 proceedings on this 18th day of November, 2016 and
7 with the exception of the changes listed on the next.
8 page and/or corrections, if any, find them to be
9 a true and accurate transcription thereof.
10
11 Signed: ....
12 Name: ROSS NEIL SUTHERLAND GOW
13 Date: ....
14
15
16
17
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1 CERTIFICATE OF EXAMINER
2 I, ALLEN DYER, of 4 Pump Court
3 Temple, London, EC4Y 7AN DX 303 LDE have been
4 appointed as Examiner herein pursuant to an Order of
5 Master Fontaine dated 29 September 2016. It has been
6 agreed by all parties herein that the evidence of the
7 witness, ROSS NEIL SUTHERLAND GOW, should be taken
8 down in shorthand and that the transcript of the said
9 notes of evidence should be deemed to be the
10 deposition of the said witness.
11
12 I certify that, the oath having been duly
13 administered, the witness has been examined pursuant
14 to the said order. The pages of transcript annexed
15 hereto were furnished to me by DTI, Lisa Barrett,
16 Accredited Real-time Reporter, as containing the
17 transcript of the notes of the evidence of the witness
18 pursuant to the order.
19
20
21
22
23
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25

1 CERTIFICATE OF DEPONENT

2

3 I, Ross Neil Sutherland Gow, hereby certify that I have read the foregoing pages, numbered 1 through 122,
4 of my video deposition of testimony taken in these proceedings on this 18th day of November, 2016 and,
5 with the exception of the changes listed on the next page and/or corrections, if any, find them to be a
6 true and accurate transcription thereof.

7

8

9 Signed: ....

10 Name: Ross Neil Sutherland Gow

11 Date: ....

12

13

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1 CERTIFICATE OF COURT REPORTER
2
3 I, Lisa M. Barrett, an Accredited Real-time Reporter,
4 hereby certify that the testimony of the witness Ross
5 Neil Sutherland Gow in the foregoing transcript,
6 numbered pages 1 through 122, taken on this 18th day
7 of November, 2016 was recorded by me in machine
8 shorthand and was thereafter transcribed by me; and
9 that the foregoing transcript is a true and accurate
10 verbatim record of the said testimony.
11
12
13 I further certify that I am not a relative, employee,
14 counsel or financially involved with any of the
15 parties to the within cause, nor am I an employee or
16 relative of any counsel for the parties, nor am I, in
17 any way, interested in the outcome of the within
18 cause.
19
20
21 Signed: ....
22 Name: Lisa M. Barrett, RPR, CRR, CRC, CSR
23 Date: November 30th 2016
24
25

---------- Forwarded message ----------
From: **James Ball** <james.ball@theguardian.com>
Date: 1 January 2015 at 21:46
Subject: URGENT – Ghislaine Maxwell
To: ross@acuityreputation.com

Dear Ross,

I'm writing to you as you have in the past represented Ghislaine Maxwell. As you are no doubt aware, fresh allegations have been levelled against Ms Maxwell in new US court filings made in Florida on 30 December, which some outlets have already been reported.

I would urgently seek any comment on behalf of your client, or notification of her new representation if you no longer act for her.

Many thanks for your help,
James

From: Ross Gow <ross@acuityreputation.com>
Sent: Friday, January 02, 2015 1:07 AM
To: G Max
Cc: Brian Basham
Subject: Fwd: URGENT – Ghislaine Maxwell

Hi Ghislaine
James Ball, investigative reporter for The Guardian, who reports on US stories, has made contact, as per below.

Please advise how you wish to handle this. I am driving all day today, but can be contacted on +44 (0) 7778 755 251

Best
Ross

---------- Forwarded message ----------
From: **James Ball** <james.ball@theguardian.com>
Date: Thursday, January 1, 2015
Subject: URGENT – Ghislaine Maxwell
To: ross@acuityreputation.com

Dear Ross,

I'm writing to you as you have in the past represented Ghislaine Maxwell. As you are no doubt aware, fresh allegations have been levelled against Ms Maxwell in new US court filings made in Florida on 30 December, which some outlets have already been reported.

I would urgently seek any comment on behalf of your client, or notification of her new representation if you no longer act for her.

Many thanks for your help,
James

--
· James Ball · Special Projects Editor · +44 203 3533 293 · +44 7540 825 494 · @jamesrbuk ·

--
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+7 903 363 5393 Москва Мобильный

www.acuityreputation.com

EXHIBIT H

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff, Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.
___________________________________/

PLAINTIFF'S RESPONSES AND OBJECTIONS TO DEFENDANT'S SECOND REQUEST FOR PRODUCTION AND DEFENDANT'S INTERROGATORIES, PLAINTIFF'S ANSWERS TO DEFENDANT'S REQUESTS FOR ADMISSION

Pursuant to Federal Rules of Civil Procedure 26, 33, 34, Plaintiff hereby serves her responses and objections to Defendant's Second Set of Discovery Requests and serves her Answers to Defendant's Requests for Admission.

GENERAL OBJECTIONS

Defendant's Discovery Requests violate Rule 33, Fed. R. Civ. P., which provides "a party may serve on any other party no more than 25 interrogatories, including all discrete subparts" – in that Defendant has served a total of 59 interrogatories in this case, including subparts, in violation of Rule 33.

Ms. Giuffre objects to Defendant's Second Set of Discovery Requests to the extent they seek information that is protected by any applicable privilege, including but not limited to, attorney client privilege, work product privilege, joint defense privilege, public interest privilege, and any other applicable privilege.

on hundreds (if not thousands) of matters, and collectively have well over 100 years of combined practice experience. Accordingly, a request that each of these attorneys list *all communications with the media* is facially overbroad.

Additionally, Ms. Giuffre objects to this Interrogatory because a response would cause Ms. Giuffre the incredible and undue burden of having to catalogue literally hundreds of communications that she has already produced in this case.

Moreover, Ms. Giuffre objects because this interrogatory calls for the production of documents that are irrelevant to this action and not reasonably calculated to lead to the discovery of admissible evidence. Communications with the media regarding cases that bear no relation to the subject matter of this case, from decades in the past, are facially invalid and not calculated to lead to the discovery of admissible evidence.

Ms. Giuffre additionally objects to the extent that this interrogatory seeks the communications of her attorneys, any author, reporter, correspondent, columnist, writer, commentator, investigative journalist, photojournalist, newspaper person, freelance reporter, stringer, or any other employee of any media organization or independent consultant as such interrogatory is overly broad and unduly burdensome. Furthermore, Ms. Giuffre is not obligated to produce anything currently in the possession of Defendant Maxwell or her attorneys.

Notwithstanding such objections, Ms. Giuffre has already produced her responsive communications, which are found in documents Bates labelled GIUFFRE000001 to GIUFFRE007566.

6. Identify any "false statements" attributed to Ghislaine Maxwell which were "published globally, including within the Southern District of New York" as You contend in paragraph 9 of Count I of Your Complaint, including:

a. the exact false statement;

b. the date of its publication;

c. the publishing entity and title of any publication containing the purportedly false statement;

d. the URL or internet address for any internet version of such publication; and the nature of the publication, whether in print, internet, broadcast or some other form of media.

Response to Interrogatory No. 6:

Ms. Giuffre objects because the information interrogatory above *is in the possession of Defendant* who has failed to comply with her production obligations in this matter, and has failed to comply with her production obligations with this very subject matter. *See* Document Request No. 17 from Ms. Giuffre's Second Request for Production of Documents to Defendant Ghislaine Maxwell.[1] Maxwell has not produced all "URL or Internet addresses for any internet version of such publication" that she directed her agent, Ross Gow, to send.

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[1] Request No. 17 stated: Produce all documents concerning any statement made by You or on Your behalf to the press or any other group or individual, including draft statements, concerning Ms. Giuffre, by You, Ross Gow, or any other individual, from 2005 to the present, including the dates of any publications, and if published online, the Uniform Resource Identifier (URL) address. In response, Defendant stated: "Ms. Maxwell objects to this Request on the grounds that it is cumulative and duplicative. Ms. Maxwell also objects to this Request to the extent it calls for information that exists within the public domain, the internet or in public court records and which are equally available to both parties and can be obtained from some other source that is more convenient, less burdensome, and less expensive. Ms. Maxwell further objects to this Request to the extent it seeks documents or information protected by the attorney/client privilege, the work-product doctrine, or any other applicable privilege. Ms. Maxwell is not producing documents that are available in the public domain. Ms. Maxwell has been unable to locate any additional documents responsive to this Request."

Ms. Giuffre further objects because the information requested above *is in the possession of Defendant's agent*, who caused the false statements to be issued to various media outlets. Ms. Giuffre has not had the opportunity to depose Maxwell's agent Ross Gow; therefore, this answer remains incomplete. Consequently, Ms. Giuffre reserves the right to modify and/or supplement her responses, as information is largely in the possession of the Defendant and her agent.

Ms. Giuffre objects to this interrogatory in that it violates Rule 33 as its subparts, in combination with the other interrogatories, exceed the allowable twenty-five interrogatories. Ms. Giuffre objects to this request because it is in the public domain. Ms. Giuffre also objects in that it seeks information protected by the attorney-client/work product privilege, and any other applicable privilege stated in the General Objections.

Notwithstanding such objections, Ms. Giuffre has already produced documents responsive to this request; Bates labelled GIUFFRE000001 to GIUFFRE007566, and supplements such responsive documents with the following list of publications. While the identification of an exhaustive responsive list would be unduly burdensome, in an effort to make a good faith effort towards compliance, Ms. Giuffre provides the following examples, which are incomplete based on the aforementioned reasons:

Date	**Nature**	**Publishing Entity**	**Statement/URL**
January 2, 2015	Internet	Ross Gow	Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue. Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies. Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory. Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at

			the repetition of such old defamatory claims.
January 3, 2015	Internet	Telegraph	http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html
January 4, 2015	Internet	Express	http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew
January 3, 2015	Internet	Daily Mail	http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe html
January 3, 2015	Internet	Huffington Post	http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims_n_6409508 html
January 4, 2015	Internet	Jewish News Online	http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/
January 2, 2015	Internet	Bolton News	http://www.theboltonnews.co.uk/news/national/11700192.Palace_denies_Andrew_sex_case_claim/
January 5, 2015	Internet / Broadcast	NY Daily News	http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
January 5, 2015	Internet / Broadcast	AOL UK	http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 1, 2016, I electronically sent the foregoing document to the counsel below via e-mail.

Laura A. Menninger, Esq.
Jeffrey Pagliuca, Esq.
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EXHIBIT I

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff, Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.
_______________________________/

PLAINTIFF'S SUPPLEMENTAL RESPONSES TO
DEFENDANT'S INTERROGATORIES 6, 12 and 13

Pursuant to Federal Rules of Civil Procedure 26, 33, 34, Plaintiff hereby serves her supplemental responses to Defendant's Interrogatories 6, 12 and 13.

OBJECTIONS

Plaintiff maintains and hereby incorporates by reference all applicable objections, including both general objections and specific objections to individual interrogatories, in her prior responses and objections served on Defendant in these supplemental responses.

Defendant's Discovery Requests violate Rule 33, Fed. R. Civ. P., which provides "a party may serve on any other party no more than 25 interrogatories, including all discrete subparts" – in that Defendant has served a total of 59 interrogatories in this case, including subparts, in violation of Rule 33.

Ms. Giuffre objects to Defendant's Discovery Requests to the extent they seek information that is protected by any applicable privilege, including but not limited to, attorney client privilege, work product privilege, and any other applicable privilege.

Jane Doe No. 102 v. Jeffrey Epstein, Case No. 09-80656-CIV-Marra/Johnson (Southern District of Florida). Accordingly, due to the undue burden of individually logging responsive, privileged documents related to Defendant's overly-broad requests, Plaintiff has employed categorical logging of such privileged responsive documents pursuant to Local Civil Rule 26.2(c).

Ms. Giuffre objects to the requests in that they seek to invade her privacy for the sole purpose of harassing and intimidating Ms. Giuffre who was a minor victim of sexual trafficking.

Ms. Giuffre objects to the requests to the extent they are overly broad and unduly burdensome.

Ms. Giuffre's responses to Defendant's Second Set of Discovery Requests are being made after reasonable inquiry into the relevant facts, and are based only upon the information and documentation that is presently known to her. Ms. Giuffre reserves the right to modify and/or supplement her responses. Ms. Giuffre has produced documents and information in response to these Requests.

Ms. Giuffre incorporates her above-listed general objections in the responses herein.

SUPPLEMENTAL INTEROGATORY RESPONSES

6. Identify any "false statements" attributed to Ghislaine Maxwell which were "published globally, including within the Southern District of New York" as You contend in paragraph 9 of Court 1 of Your Complaint, including:

a. the exact false statement;

b. the date of its publication;

c. the publishing entity and title of any publication containing the purportedly false statement;

d. the URL or internet address for any internet version of such publication; and

e. the nature of the publication, whether in print, internet, broadcast or some other form of media.

In addition to her previous response, Ms. Giuffre supplements the response to include:

January 8, 2015	Internet	The Sun	https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/?CMP=spklr-128508300-Editorial-TWITTER-TheSunNewspaper-20150108-News

12. Identify any Health Care Provider from whom You received any treatment for any physical, mental or emotional condition, including addiction to alcohol, prescription or illegal drugs, that You suffered from <u>subsequent to</u> the Alleged Defamation by Ghislaine Maxwell, including:

a. the Health Care Provider's name, address, and telephone number;

b. the type of consultation, examination, or treatment provided;

c. the dates You received consultation, examination, or treatment;

d. whether such treatment was on an in-patient or out-patient basis;

e. the medical expenses to date;

f. whether health insurance or some other person or organization or entity has paid for the medical expenses; and

g. for each such Health Care Provider, please execute the medical and mental health records release attached hereto as Exhibit A.

<u>Supplemental Response to Interrogatory No. 12:</u>

Ms. Giuffre objects to this interrogatory in that it is overbroad and not limited in scope to the medical information relating to the abuse she suffered from Defendant and Jeffrey Epstein.

Pursuant to the Rules, if requested documents are not yielded in a "reasonable inquiry," Ms. Giuffre is not obligated to expend all of her time and resources on a quest to gather medical files that are unknown to her or unaccessable after reasonable inquiry. *See, e.g., Manessis v. New York City Dep't of Trans*p., No. 02 CIV. 359SASDF, 2002 WL 31115032, at *2 (S.D.N.Y. Sept. 24, 2002)

- **Medicare Australia** provided health care insurance coverage and payment for services received in Australia from July 19, 2013 through the present.[5] Ms. Giuffre's claims history for this period is detailed at GIUFFRE007619-7620.
- **Dr. Wah Wah San**, Central Coast Family Medicine, Unit 2, 17 Anzac Rd., Tuggerah 2259, 0243518777, tel. (02)4388-9540, treated Ms. Giuffre on March 14, 2013, for panic attacks as described in the medical records produced at GIUFFRE005339-5341; and possibly on September 11, 2013 for "Standard Consultation."[6] Those records have been requested and a release sent to the provider, *see* GIUFFRE007625-7628.
- **CVS Pharmacy** provided prescribed medications to Ms. Giuffre as described in the records produced at GIUFFRE008343-08345**Walgreens Pharmacy** may have provided prescribed medications to Ms. Giuffre. Those records have been requested and a release provided to the pharmacy, *see* GIUFFRE007611-7616.
- **Dr. Timothy D. Hartwig, D.O.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, *see* GIUFFRE008346-8348.
- **Dr. James T. Nichols, M.D.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, *see* GIUFFRE008349-8351.
- **Dr. Rodolfo Torres Jr., M.D.** was identified in records produced by CVS pharmacy. Ms. Giuffre has requested those records, *see* GIUFFRE008352-8354.

Dated: August 17, 2016. Signed,

[signature]

Virginia Giuffre

[5] Records from Medicare Australia are generally limited to 3 years. Ms. Giuffre is continuing to pursue additional records from prior to July 19, 2013 through their offices in Australia.
[6] Ms. Giuffre has now identified Dr. Wah Wah San and Dr. Wah San to be the same provider to the best of her knowledge. She had previously listed both names, in an abundance of caution, before learning that Dr. Wah San was the same provider as Dr. Wah Wah San.

EXHIBIT J

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,

Plaintiff.

v.

GHISLAINE MAXWELL,

Defendant.

15-cv-07433-RWS

Declaration of Ghislaine Maxwell

I, Ghislaine Maxwell, declare as follows:

1. I am the defendant in this action.

2. I have no control or authority over any media organizations, including those media organizations that published any part of a January 2015 statement issued on my behalf at the direction of my attorney, Philip Barden.

3. Neither I nor any agent acting on my behalf approved or participated in any activity of any media organization in its decision to publish or not to publish any part of the January 2015 statement.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2017.

Ghislaine Maxwell

EXHIBIT K

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---X

15-cv-07433-RWS

Declaration of Philip Barden

I, Philip Barden, declare as follows:

1. I am a Solicitor of the Senior Courts of England & Wales based in London, England.

2. I am submitting this Declaration in support of Ghislaine Maxwell's motion for summary judgment in this action.

3. I am not authorised to and do not waive Ms. Maxwell's attorney-client privilege.

4. I have represented Ms. Maxwell since 2011 regarding the allegations made by Plaintiff Virginia Giuffre and as published in the United Kingdom. I continue to be retained in this regard. I am familiar generally with the subject matter of this action.

5. I first represented Ms. Maxwell in this matter over the weekend of 5th and 6th March 2011, about the time when various UK national newspapers, in hard copy and on line, published numerous and provocative allegations made by the Plaintiff Virginia Giuffre against Ms. Maxwell. The articles by Sharon Churcher were among those published in this time frame.

6. I instructed British press agent Ross Gow to assist me in representing Ms. Maxwell.

7. I caused to be prepared a statement to respond to the articles that appeared in the British Press over the weekend—March 5 and 6, 2011, and thereafter. I directed Mr. Gow to distribute the statements to various media outlets that had published articles.

8. On December 30, 2014, Ms. Giuffre made numerous salacious and improper allegations against Ms. Maxwell in a joinder motion publicly filed in a civil case involving Jeffrey Epstein. Shortly afterward, the British media gained access to the motion and began inquiring about Ms. Maxwell's response.

9. I continued to represent Ms. Maxwell at that time and I coordinated the response to the media. I again instructed Mr. Gow to assist me.

10. In liaison with Mr. Gow and my client, on January 2, 2015, I prepared a further statement denying the allegations, and I instructed Mr. Gow to transmit it via email to members of the British media who had made inquiry about plaintiff's allegations about Ms. Maxwell. Attached as Exhibit A1 is an email containing a true and correct copy of this statement. The statement was issued on my authority. Although it is possible others suggested or contributed content, I prepared the vast majority of the statement and ultimately approved and adopted all of the statement as my work.

11. As is evident from the timing and the typographical errors in the statement, I prepared the statement in haste. I was not in the office on 2nd January 2015 as it was the Friday immediately after New Years day which is a public holiday. Most people took 2nd January off and many business closed that day. I don't now recall where I was that day but I was hard to reach and that indicates I was out with my family. I therefore would have prepared the statement in a hurry. I recall that I wanted to get a statement out as a matter of urgency.

12. I recall that immediately after Ms. Giuffre's motion was filed, media representatives began contacting Mr. Gow and requesting Ms. Maxwell's response to Ms. Giuffre's allegations

of criminal and other misconduct by Ms. Maxwell. I believed an immediate response was imperative, even though this was happening in the midst of the holidays in the United Kingdom. My communications with Mr. Gow and with Ms. Maxwell were sporadic, delayed and hurried because of my and their own holiday schedules. I worked while on vacation and on Friday, January 2, 2015, to ensure that the statement was issued as soon as possible after receiving the media inquiries.

13. I did not ask Ms. Maxwell to respond point by point to Ms. Giuffre's factual allegations in the CVRA joinder motion. What we needed to do was issue an immediate denial and that necessarily had to be short and to the point. It should have been obvious to the media that Ms. Giuffre's new and significantly more salacious allegations had no credibility because they differed so substantially from her previous allegations, when she had the opportunity and incentive to disclose all relevant facts about being a victim of alleged sexual abuse and sex trafficking at the hands of the rich and powerful. I prepared the January 2015 statement based on my knowledge of Ms. Giuffre's past statements and her most recent statements in the joinder motion, and made the point to the media-recipients that she and her new statements, which differed so substantially from her former ones, were not credible—specifically, that the new allegations were patently false—i.e., "obvious lies."

14. By way of example I recall that prior to the December 2014 filing of the joinder motion and the subsequent press reports that Ms. Guiffre clearly stated she had not had sex with Prince Andrew. Yet in her joinder motion she claimed she did have sex with Prince Andrew and that the sex occurred in what can only be described as a very small bathtub, too small for a man of Prince Andrew's size to enjoy a bath in let alone sex. So as of December 2014 it was clear Ms. Guiffre had made polar opposite statements. She was either lying when she said they did not have sex or when she said they did. I made the inescapable inference that she is a liar, as clearly

she is, since both statements cannot as a matter of fact be true. When someone says she did not have sex and then says she did, in other words, there is an obvious lie.

15. I did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media. This is why I intentionally did not request that Mr. Gow or any other public relations specialist prepare or participate in preparing the statement. Instead, Mr. Gow served as my conduit to the media representatives who had requested a response to the joinder motion allegations and who I believed might republish those allegations.

16. My purpose in preparing and causing the statement to be disseminated to those media representatives was twofold. First, I wanted to mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. I believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, I noted that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news."

17. Second, I intended the January 2015 statement to be "a shot across the bow" of the media, which I believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. This was the purpose of repeatedly stating that plaintiff's allegations were "defamatory." In this sense, the statement was very much intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct.

18. It is important to understand that any story involving a member of the Royal Family, especially a senior member such as Prince Andrew, gains huge media attention in the UK and a story alleging he had a sex with the Plaintiff caused a feeding frenzy for the press. I wanted the

press to stop and think before publishing, to cease and desist, and that if they continued then they faced higher damages for ignoring my clear warning.

19. Consistent with those two purposes, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a *quotable statement* on behalf of Ms Maxwell" (italics supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full, if it was to be used—to plaintiff's December 30, 2014, allegations that would give the media Ms. Maxwell's response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

20. Selective and partial quotation and use of the statement would disserve my purposes. It was intended to address Plaintiff's behavior and allegations against Ms. Maxwell on a broad scale, that is to say, Plaintiff's history of making false allegations and innuendo to the media against Ms. Maxwell. This is why the statement references Plaintiff's "original allegations" and points out that her story "changes"—i.e. is embellished—over time including the allegations "now" that Professor Dershowitz allegedly had sexual relations with her. This is why I distinguished in the statement between Plaintiff's "original" allegations and her "new," joinder-motion allegations, which differed substantially from the original allegations. And this is why I wrote, "Each time the story is *re told* [sic] it *changes* with *new* salacious details about public figures and world leaders and *now* it is alleged by [Plaintiff] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies." (Emphasis supplied.) Having established the dramatic difference between Plaintiff's two sets of allegations, which suggested she was fabricating more and more-salacious allegations as she had more time to manufacture them, I added the third paragraph: "[Ms. Giuffre's] claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory." (Emphasis supplied.) I believed then, and believe now, that it was and remains a fair inference and conclusion that her claims

were and are "obvious lies." As noted, her claims not to have slept with Prince Andrew and to have slept with Prince Andrew are a classic example of an obvious lie. One or other account is on the face of it a lie.

21. As an example of her lack of credibility, the Plaintiff made allegations against Professor Dershowitz, which I understand she has now withdrawn. Professor Dershowitz has credibility because his story, insofar as I am familiar with it, has been consistent; Ms. Giuffre has no credibility because her story has shifted and changed.

22. Further the Plaintiff's account has become more salacious, for example, regarding Prince Andrew. The Plaintiff clearly has been seeking publicity for her story and it is clear to me that she understands retelling the same story doesn't feed the media and generate publicity and so each time she appears to create new allegations to generate media interest.

23. I understand the Plaintiff alleged in her Complaint in this action that the following statements are defamatory. She alleges it was defamatory in the first paragraph of the January 2015 statement to state that "the allegations made by [the Plaintiff] against [Ms.] Maxwell are untrue." For the reasons stated above, it was and is my considered and firm opinion that, in fact, her allegations are untrue. She alleges it was defamatory to state in the same paragraph that the "original allegations" have been "shown to be untrue." For the reasons stated above, it was and is my considered and firm opinion that, in fact, her allegations are untrue. Finally, she alleges that it was defamatory in the third paragraph to state that her claims are "obvious lies." For the reasons stated above, it was and is my considered and firm opinion that, in fact, her claims are obvious lies.

24. Both Mr. Gow and I understood that once the January 2015 statement was sent to the media-representatives, we had no ability to control whether or how they would use the statement and we made no effort to control whether or how they would use the statement.

25. It is my understanding that some of the media-recipients of the January 2015 statement did not publish any part of the statement. I am unaware of any media-recipient publishing the statement in full.

26. The issuance of the statement fully complied with my ethical obligations as a lawyer. Indeed it was duty in representing my client's interests to ensure that a denial was immediately issued. I would have been remiss if I had sat back and not issued a denial, and the press had published that Ms. Maxwell had not responded to enquiries and had not denied the new allegations; the public might have taken the silence as an admission there was some truth in the allegations.

27. The content of the statement was entirely based on information I acquired in connection with my role as counsel for Ms. Maxwell.

28. At the time I directed the issuance of the statement, I was contemplating litigation against the press-recipients as an additional means to mitigate and prevent harm to Ms. Maxwell. Whilst the limitation period for a pure defamation claim has now expired, claims are still being considered for example for publishing a deliberate falsehood, conspiracy to inure and other tortious acts.

29. In any such UK defamation, or other related, action Ms. Giuffre would be a defendant or a witness.

30. I directed that the statement indicate Ms. Maxwell "strongly denie[d] the allegations of an unsavoury nature," declare the allegations to be false, give the press-recipients notice that the publications of the allegations "are defamatory," and inform them that Ms. Maxwell was "reserv[ing] her right to seek redress."

I declare under penalty of perjury that the foregoing is true and correct.

Executed on January 6, 2017.

Philip Bardon

EXHIBIT L

1 UNITED STATES DISTRICT COURT
for the
2 SOUTHERN DISTRICT OF NEW YORK

3 Civil Action No. 15-cv-07433-RWS

4 VIRGINIA GIUFFRE,

5 Plaintiff,

6 vs.

7 GHISLAINE MAXWELL

8 Defendant.

9 --

10 VIDEO-DEPOSITION
OF: JAMES MICHAEL AUSTRICH

11

TAKEN BY: Defendant

12

REPORTED BY: Karla Layfield, RMR
13 Stenographic Court Reporter
Notary Public
14 State of Florida at Large

15 DATE AND TIME: June 23, 2016; 9:03 a.m.

16 PLACE: Owen & Associates Court Reporters
108 N. Magnolia Avenue, Suite 501
17 Ocala, Florida

18 APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
19 150 East 10th Avenue
Denver, Colorado 80203
20 Attorney for Defendant

21 Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
22 FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
23 Fort Lauderdale, Florida 33301
Attorney for Plaintiff

24

Also Present: Kenneth Sarsony, Videographer
25 Virginia Giuffre

1 I N D E X

10
\- - -
11

12

13 E X H I B I T S

21

22 (Exhibits attached.)

23

24

25

1 Broward and Miami a lot.

2 Q Okay. Where did you go to high school?

3 A Robert Morgan.

4 Q Which city is that in?

5 A I guess Miami.

6 Q Okay. When did you graduate?

7 A '98.

8 Q How old are you now?

9 A 35.

10 Q When is your birthday?

11 A [redacted].

12 Q Do you remember a woman by the name of Virginia

13 Roberts?

14 A Yes.

15 Q And do you see her here in the room today?

16 A Yes.

17 Q When was the last time that you saw her?

18 A Sixteen years ago.

19 Q How did you meet Ms. Roberts?

20 A She was a friend of my sister's, and that's how

21 I met her.

22 Q What is your sister's name?

23 A [redacted] (phonetic). Last name is spelled

24 [redacted] but I still can't spell it. My step-sister.

25 But after so long, she's basically my sister.

1 Q Okay. Where is Ms. [redacted] now?
2 A I believe Broward County.
3 Q How is it that she came to introduce you to
4 Ms. Roberts?.
5 A She brought her to the house.
6 Q And do you know how they were friends?
7 A They met each other in rehab.
8 Q What kind of rehab?
9 A I'm not sure. I was living in Miami at the
10 time, and I only came up once in a while to visit her. At
11 the very end, when I moved back to Broward with my dad,
12 that's when [redacted] home.
13 Q Do you know the name of the rehab program?
14 A No.
15 Q And you do you know what the rehab program was
16 for, drugs, alcohol?
17 A I don't know. I guess, everything probably.
18 Q Do you recall approximately what year you met
19 Ms. Roberts?
20 A I believe around '98.
21 Q How old were you at that time?
22 A 18.
23 Q Do you know how old Ms. Roberts was?
24 A 15 or 16, I believe.
25 Q Was she approximately your sister's age?

1 working at the Taco Bell in Sunrise. Did I get that
2 right?
3 A Yeah, yeah.
4 Q Okay. Did Ms. Roberts come to work at the Taco
5 Bell where you worked?
6 A Not at that one in Sunrise. When we moved to
7 Broward, she worked with me. I think it was another one
8 in Sunrise.
9 Q Okay. So you're saying sometime later you and
10 Ms. Roberts moved to Broward. Is that right?
11 A Yes, we lived in an apartment.
12 Q Where was that apartment?
13 A Oakland Park, I believe.
14 Q And when you moved to that apartment in Oakland
15 Park, that's when she came to work with you at Taco Bell?
16 A Yes.
17 Q Do you know about how old you were when that
18 happened?
19 A It had to be around -- it wasn't long after
20 meeting her.
21 Q Why don't you take a step back and tell me what
22 you recall about meeting Ms. Roberts.
23 A It was a long time ago.
24 Q I understand.
25 A All I remember is my sister bringing her over

1 one day, we got to talking, we liked each other, and we
2 just got to know each other.
3 Q Was she in school at the time?
4 A No.
5 Q Why not?
6 A I'm not entirely sure.
7 Q Was she done with this rehab program?
8 A Yes, at the time.
9 Q Did she go back into it later?
10 A Not that I know of.
11 Q So your understanding is, she was not in school
12 and not in the rehab program at the time that you met
13 Ms. Roberts. Correct?
14 A Not that I know of, no.
15 Q Where was she living when you met Ms. Roberts?
16 A She was staying with us -- or she came over, and
17 then I guess she was staying with us for a little while, I
18 believe.
19 Q And who do you mean by "us"?
20 A At my dad's house.
21 Q Who else was living there besides yourself, your
22 dad and your sister?
23 A My step-mom, my other step-sister, my
24 step-brother and their grandmother. It was a big house.
25 Q How long do you recall Ms. Roberts living at

1 that house with the family?
2 A No idea. Not long.
3 Q Weeks, months, years?
4 A Weeks.
5 Q Okay. You said that you spent some time getting
6 to know Ms. Roberts when you first talked to her?
7 A Uh-hmm.
8 Q Did she tell you anything about her childhood?
9 A If she did, I don't remember, it was so long
10 ago.
11 Q Do you recall meeting her parents?
12 A Yes.
13 Q Was that some time later?
14 A Yes.
15 Q Tell me about when you remember meeting her
16 parents.
17 A I think that was -- all I remember -- really,
18 all I remember is going to the house and meeting her
19 parents. I don't remember much from that time.
20 Q Okay. I appreciate that this is all a long time
21 ago
22 A Yeah.
23 Q Did you and Ms. Roberts become a couple soon
24 after you met her?
25 A Yes.

1 Q Was she dating anyone else at that time?
2 A No.
3 Q Tell me where you -- did you both move out of
4 that home, your dad's home, together?
5 A Yes.
6 Q And where did you go directly after that home?
7 A To the Oakland Park apartment.
8 Q At the time you got the Oakland Park apartment,
9 do you recall how old you were?
10 A I had to be 18 to get an apartment.
11 Q Okay. And do you know how old Ms. Roberts was?
12 A 16.
13 Q Is that a guess, or do you remember?
14 A That's a guess.
15 Q Do you think you are about two years older than
16 she is?
17 A About. Maybe a little more.
18 Q Okay. How long did you two live together at the
19 Oakland Park apartment?
20 A Less -- I know it wasn't a full year. I don't
21 know exactly how long it was. I don't know how many
22 months it was.
23 Q Did anyone else live there with you?
24 A Yes, a roommate.
25 Q Who was that?

1 A Mario. Last name, I can't remember. I haven't
2 seen him since that apartment.
3 Q Was he a friend of yours or hers, or just
4 someone else?
5 A He was a friend of mine. He worked with me at
6 Taco Bell.
7 Q And after you moved to this Oakland Park
8 apartment, Ms. Roberts came to work at the Taco Bell as
9 well?
10 A Yeah, with him and me.
11 Q Do you recall where that Taco Bell was?
12 A By the Sawgrass Mall.
13 Q How long did Ms. Roberts work at that Taco Bell?
14 A I don't remember.
15 Q You were a manager at the time?
16 A Yes, me and my roommate.
17 Q You were both managers?
18 A Yeah.
19 Q Was she an official employee?
20 A Yes.
21 Q She was on the payroll?
22 A Yes.
23 Q And you were the manager?
24 A Um-hmm?
25 Q And she paid -- she was paid for by Taco Bell?

1 A Yes.
2 Q Was it is a franchise, if you know?
3 A I know when I first started there, they were
4 corporate, but then they were a franchise. They were
5 bought out. But I'm not sure if when I got there they
6 were a franchise or not.
7 Q Got it.
8 Do you know if Ms. Roberts had any previous
9 employment before she worked at Taco Bell?
10 A I think by the apartment, she worked for KFC for
11 a little while.
12 MS. MENNINGER: Are you looking at Ms.
13 Roberts?
14 THE WITNESS: I'm thinking. I can't
15 remember. I remember something with KFC. They
16 had one really close to us. I think she worked
17 there for a tiny, tiny bit. I'm not sure.
18 MS. MENNINGER: Okay.
19 BY MS. MENNINGER:
20 Q Before the Taco Bell?
21 A Or she could've applied there. It's just in my
22 head. She might have just applied there, and didn't get
23 it, and that's why I brought her to Taco Bell.
24 Q Okay.
25 A Because we were both the night managers.

1 Q Okay. Got it.
2 So for not a full year, the two of you worked
3 together at a Taco bell near the Sawgrass Mills (as
4 heard) and lived in an apartment in Oakland Park?
5 A Yes.
6 MR. EDWARDS: Object to the form.
7 BY MS. MENNINGER:
8 Q With Mario?
9 A Yeah.
10 Q Did Mario live there the whole time?
11 A Yes.
12 Q What caused you to stop living at the Oakland
13 Park apartment?
14 A I don't remember exactly. But I know we moved
15 out before, and Mario stayed in the apartment.
16 Q Where did you move to?
17 A Her parent's house.
18 Q Did you move into the house or to someplace near
19 the house?
20 A I don't remember if we originally moved into the
21 house. But I know they had a trailer in the back that we
22 lived in.
23 Q How long did you live in the trailer in the
24 back?
25 A No idea.

1 A No.
2 Q Do you know about what years this was?
3 A Not really.
4 Q Do you know about how old you were?
5 A When, what?
6 Q I'm just focused on the period of time in which
7 you were living at her parent's house in the trailer.
8 A I was probably 18 when we moved in there.
9 Q And you said you were only there for a couple of
10 months?
11 A Not that I remember. Like, it might have been a
12 little longer. I'm not sure.
13 Q Were you engaged to Ms. Roberts?
14 A Yes.
15 Q When did you become engaged to her?
16 A When we were living in Oakland Park.
17 Q Tell me about the engagement. How did it come
18 about?
19 A Well, we fell in love, and -- I believe it was
20 Valentine's Day when I proposed.
21 Q Did you have a ring?
22 A Yes.
23 Q Did she accept?
24 A Yes.
25 Q How long were you engaged?

1 A I'm not entirely sure.
2 Q Do you remember an event where the engagement
3 was broken off?
4 A When I left.
5 Q Left where?
6 A When I left -- Royal Palm Beach, I guess, was
7 our apartment.
8 Q When you left that apartment, that's when the
9 engagement was over in your mind?
10 A Yes.
11 Q Were your families happy about the engagement?
12 A Yes. My mother was. My dad wasn't too happy.
13 Q Have you ever been married since then?
14 A No.
15 Q Have you ever been engaged since then?
16 A No.
17 Q Do you know what happened to the ring?
18 A Yes.
19 Q Where is it?
20 A I have it.
21 Q Still?
22 A Yeah. It was my grandmother's.
23 Q Did you get down on one knee?
24 A Yes, at the beach, I believe.
25 Q When you were living in Oakland Park, in this

1 Q So from about the ages you were 18 to 20 is when
2 you were living together with Virginia?
3 A Yeah.
4 Q And between the time you met her at your dad's
5 house and the time that you broke up, did you guys break
6 up and get back together, or was it one consistent
7 relationship, and then it had an end date?
8 A Yeah, one consistent relationship.
9 Q Okay. You mentioned that you moved into an
10 apartment in Royal Palm Beach?
11 A Yeah, I believe that's where it was, Royal Palm
12 Beach.
13 Q Do you remember anything about the apartment?
14 A All I remember, it was on the third floor.
15 Q And who got that apartment?
16 A I did.
17 Q Again, you were over 18 at that time?
18 A Yes.
19 Q So you got the lease?
20 A Yes.
21 Q Do you remember looking for the apartment?
22 A I believe so.
23 Q And it wasn't the first apartment you rented,
24 right?
25 A No. No, the one in Oakland Park was the first

1 one I rented.
2 Q Okay.
3 MS. MENNINGER: I'm going to show you some
4 photographs. If I could have you mark this. I
5 guess we'll start again with, I guess we'll start
6 again with Defendant's Exhibit -- I got one for
7 you. Defendant's Exhibit 1 or A, whatever you put
8 on it.
9 THE COURT REPORTER: 1.
10 MS. MENNINGER: Exhibit 1.
11 (Defendant's Exhibit 1, photograph, was
12 marked for identification.)
13 BY MS. MENNINGER:
14 Q Please take a look at this. There are two
15 photographs stapled together.
16 Does that look like the apartment that you
17 lived in on the third floor?
18 A It could be. I don't really remember it.
19 Q The address on this is 368 Bent Oak. Does that
20 sound about right?
21 A Bent Oak sounds familiar.
22 Q You don't recognize the -- it may have been
23 painted, for example?
24 A Yeah. I mean, all I remember is being on the
25 third floor.

1 MS. MENNINGER: I'm going to show you another
2 exhibit. Let me find it. We'll mark this
3 Defendant's Exhibit 2.
4 (Defendant's Exhibit 2, passport, was marked
5 for identification.)
6 BY MS. MENNINGER:
7 Q I know this is not terribly easy to read, but
8 it's a passport application that has been previously
9 identified in this case. And in the middle section,
10 there's emergency contact information that says "James
11 Austrich".
12 Do you see that?
13 A Yes.
14 Q Is that you?
15 A Yes.
16 Q And it says 368 Bent Oak Drive below that?
17 A Yes.
18 Q Does that refresh your memory as to the address,
19 the apartment that you lived in in Royal Palm Beach?
20 A Like I said, Bent Oak sounds very familiar, and
21 I know it was Royal Palm Beach. So possibly it was that
22 one.
23 Q Okay. And how long do you think that you lived
24 in this apartment?
25 A I'm not entirely sure. Less than a year, that's

1 MS. MENNINGER: I'm going to mark this
2 exhibit as Defendant's Exhibit 3.
3 (Defendant's Exhibit 3, Citation Tracking
4 Report, was marked for identification.)
5 BY MS. MENNINGER:
6 Q I'm going to have you take a look at this.
7 Actually, I apologize because I need you to turn back
8 several pages to -- the lower right-hand corner has some
9 page numbers that say G.M. And I need you to go to 781.
10 A (Witness complies.)
11 Q Could I have you take a look at the narrative
12 section of that page. If you want to just read that
13 paragraph.
14 A "John Perkins," I don't even know that name.
15 MS. MENNINGER: I guess you guys haven't kept
16 in touch.
17 MR. EDWARDS: He was scared that day.
18 THE WITNESS: (cont'd) Plus, when I left
19 there, I didn't really talk to anybody from up
20 there. I remember somewhat of that. Yeah, I
21 remember the cops telling me even though it was
22 under my name, I couldn't go in. And I think
23 later on then they got out so I could go back and
24 get me stuff. I think I was going to see my
25 animals.

1 BY MS. MENNINER:
2 Q Yeah. I didn't know if reading this might cause
3 you to remember some things.
4 A I somewhat remember that. I remember the cops
5 coming and telling me I wasn't allowed to go in my own
6 apartment that was under my name.
7 Q Okay. So this is dated June 10th, of 2001. And
8 it places you at 368 Bent Oak Drive, correct?
9 A Yes.
10 Q Okay. Do you understand that to likely be where
11 you were living with Ms. Roberts?
12 A Yeah. But at the time I was already back in
13 Broward.
14 Q Okay. Do you know how long you had been back in
15 Broward?
16 A Not a clue.
17 Q And in this, it refers to Ms. Roberts as your
18 ex-fiancé, correct?
19 A Yes.
20 Q So presumably the event you described where you
21 had a fight and left had already occurred?
22 A Yes.
23 MR. EDWARDS: Form.
24 THE WITNESS: I know I was already out of
25 there. And that's why when I went back, that's

1 when the cops said I couldn't go in my own
2 apartment.
3 BY MS. MENNINGER:
4 Q So your recollection today is that you were
5 returning to that apartment to either get things or check
6 on pets?
7 A Yes.
8 Q What pets do you recall having?
9 A A dog and six cats and, I believe, ferrets and
10 rabbits. One reason we got along so well is because we
11 liked animals.
12 Q And do you remember going back to the apartment
13 to check on the pets and encountering Ms. Roberts and
14 Tony?
15 A Yeah.
16 Q Were you inside the apartment when you
17 encountered them?
18 A No, outside.
19 Q Did you understand them to be living in the
20 apartment at that time?
21 A Yes.
22 Q In the police report it says "Austrich stated
23 his ex-fiance, Virginia Roberts, who also resides at the
24 above-listed address, brought her friend to the
25 apartment."

1 A I believe that was Tony.
2 Q Okay. And at this time, the police are
3 indicating that you both lived there. But that's not what
4 you remember?
5 A No. They wouldn't even let me -- all I
6 remember -- I remember being outside the door and the cops
7 wouldn't let me go in there because -- even though it was
8 my apartment and my address was on the thing, I wasn't
9 allowed in there. Because I'm pretty sure I wasn't living
10 there. I just came back to get something.
11 Q Do you know how long after you left you were
12 coming back to get something?
13 A I don't remember.
14 Q If you left your pets there, I guess, I'm just
15 wondering whether you intended to go back and get your
16 pets?
17 A I couldn't because my dad didn't -- my dad
18 didn't really take -- like, he didn't want all those
19 animals. Because he already had three dogs and he wasn't
20 a fan of cats.
21 MR. EDWARDS: Or ferrets.
22 A (cont'd) Or ferrets or rabbits. I think we had
23 a gerbil, mice, rats, all kinds of stuff. I know we had
24 pet store cages that we bought to keep them all in.
25 Because when we lived in West Palm Beach it was like a

1 little animal rescue for a while.
2 Q Did you get that stuff from the pet store where
3 you both had worked?
4 A Yes.
5 Q A discount, I hope?
6 A I feel like every time I went to the pet store,
7 I got a new animal. Still do the same thing.
8 Q Do you have pets today?
9 A Oh, yeah. I have dogs. I have two dogs. We
10 have six cats and three birds.
11 Q No reptiles?
12 A No. No, I don't really like ---
13 Q Is that a different kind of pet owner?
14 A Well, I had reptiles in West Palm Beach. They
15 are too hard to take care of.
16 Q Spiders?
17 A No, I don't want to be -- I have enough spiders
18 where I live. I don't need pet spiders.
19 Q Okay. All right.
20 Do you remember Tony punching you in the
21 face?
22 A I don't remember.
23 Q You see that's what the police report says?
24 A Yeah, yeah, yeah. He might have. I don't
25 remember.

1 Q And the police observed you to have minor
2 swelling and a large red mark. Does that sound accurate?
3 A From according to what it says, yeah. I don't
4 really remember that. I remember being at the door and
5 the cops coming and telling me I can't go in there. Once
6 I read that, that's really all I remember.
7 Q Do you believe that whatever altercation you had
8 took place within the apartment or outside the apartment?
9 A In the doorway at the most. I never went inside
10 that apartment when that was happening, not I remember.
11 Q Do you ever get to see those pets again?
12 A Yes. I think later on, they both left for the
13 day and let me go in and see my pets.
14 Q Now, this indicates that the police were there
15 at about 9:20 in the evening, and you were there with
16 Mr. Perkins. But you don't remember Mr. Perkins?
17 A No. If it would have said "Josh" I think that
18 might be a name I remember. But John -- I know we had two
19 friends up there. John could have been one of them, but I
20 don't really remember. John Perkins. That's so weird.
21 Q The police report also indicates that
22 Mr. Figueroa observed Perkins on the telephone and fled
23 the scene prior to arrival. Do you remember that?
24 A No. I don't remember "Perkins". As soon as I
25 saw that name, I'm like "Who the hell is John Perkins?"

1 Q All right. If you can turn to the next page.
2 The police report continues that they made numerous
3 attempts to contact you and Mr. Perkins, whoever he is --
4 A Yeah.
5 Q -- and Ms. Roberts at the residence or on the
6 phone, but had not been able to do that?
7 A If they called the residence, I wasn't living
8 there. And I don't remember them ever trying to call me
9 in Broward.
10 Q Do you know if you had a cell phone? This was
11 back in '01. I don't even know if I had a cellphone in
12 '01?
13 A Yeah, I really couldn't tell ya'.
14 Q Okay. So your best recollection, after
15 reviewing this report, is that you had left on a previous
16 date and came back on this date to see your pets?
17 A Yeah, yeah.
18 Q And that you were ultimately able to get in and
19 see the pets?
20 A Later on, yes.
21 Q Okay. Like, the same day or --
22 A Later on. I don't really remember how much
23 longer --- how many days later, or something. Not too
24 long.
25 Q And when you came back at that later time, you

1 did not encounter Ms. Roberts?
2 A No, nobody was in the house but my animals.
3 Q And since that time you have not had any contact
4 with Ms. Roberts?
5 A No.
6 Q Okay. What was your opinion of Tony?
7 MR. EDWARDS: Form.
8 THE WITNESS: An idiot. That's all I really
9 remember.
10 BY MS. MENNINGER:
11 Q Did you believe him to be using drugs?
12 A Yes.
13 Q Do you know what kind?
14 A Whatever he could get.
15 Q When Ms. Roberts started hanging out with Tony
16 again, did you then believe her to be using drugs?
17 A Yes.
18 MR. EDWARDS: Form.
19 BY MS. MENNINGER:
20 Q What caused you to have that belief?
21 A Actions.
22 MR. EDWARDS: Same objection.
23 BY MS. MENNINGER:
24 Q What kinds of actions?
25 A I don't remember. All I remember is that's what

1 A Sorry.
2 Q You're still under oath, do you remember?
3 A Yes.
4 Q Okay. So you were referring a little bit to the
5 time that Ms. Roberts worked for Jeff?
6 A Yes.
7 Q You knew him as Jeff or Jeffrey?
8 A I remember Jeff. It could have been Jeffrey.
9 Q Okay. Tell me what you recall about Ms. Roberts
10 going to work for Jeff.
11 A I don't remember much of it, really. All I
12 remember is that she went to work for him. I know they
13 went to some island. I know they traveled around. And he
14 had a house in Palm Beach I think it was.
15 Q Did she tell you what she was doing for Jeff?
16 A At the beginning, it was massage. That's what I
17 was told.
18 Q By her?
19 A Yes.
20 Q Okay. Did she seem excited about that job?
21 A Yes.
22 Q Was she getting paid more money?
23 A Yes.
24 Q Do you know how much?
25 A No. A lot more.

1 Q So she hadn't come to you before that and said,
2 "Hey, I'm having to do something other than massages"?
3 A I don't remember.
4 Q She may have; she may not have?
5 A Yeah. I don't remember.
6 Q Well, why would you be fighting about it at the
7 end?
8 A Well, that's because she was messing with Tony,
9 the idiot.
10 Q So the fight --
11 A I mean, that's what he -- the fight's what
12 brought everything out.
13 Q Okay. So she was messing with Tony, the idiot,
14 and you guys got in a fight about her messing with Tony?
15 A I think that's what it originally it was.
16 Because she was supposed to come home, and I think she
17 went over there instead. That's when I found out --
18 that's when I found out about that, with the idiot. Then,
19 I believe the other stuff came to light. I don't really
20 remember.
21 Q As you sit here, you think that's when you were
22 finding out about all of this at the same time?
23 A I believe so, but I don't really remember.
24 Q Do you know where Tony lived?
25 A Somewhere around there, where our other

1 Q You had trouble figuring out what was the truth?
2 A Yeah. But I know for sure she was with the
3 idiot, so that's the main reason.
4 Q Well, you saw her with him, right?
5 A Well, I found out that she was in town, but not
6 here, and that's when I found out.
7 Q Okay. Not at home -- not at your home?
8 A Yeah.
9 Q When you believed yourself to be engaged?
10 A Yes.
11 Q Okay. She was not truthful with you about her
12 whereabouts?
13 MR. EDWARDS: Object to the form.
14 THE WITNESS: Yes.
15 BY MS. MENNINGER:
16 Q And you confirmed that in some fashion?
17 A Yes.
18 Q When another problem arose at the apartment, the
19 police were called, correct?
20 MR. EDWARDS: Form.
21 THE WITNESS: Other than that?
22 BY MS. MENNINGER:
23 Q With Mr. Perkins?
24 A I don't -- all I remember is that one time.
25 Q I just did a really bad question, so let me try

1 about being forced to do things --
2 A No. She might have told me some stuff, but
3 what, I don't remember really. Who knows if it was the
4 truth at the time anyway.
5 Q And you weren't doing drugs at that time?
6 A I wouldn't say no. I know at the end, I was
7 smoking a lot. And I might have been doing some other
8 stuff. I'm not sure.
9 Q Okay. Regardless, you would not have been
10 comfortable believing your fiancé was having sex with
11 other people?
12 A No.
13 Q Did she, Ms. Roberts ever tell you that she was
14 posing naked for photographs?
15 A No.
16 Q Would you have been okay with her posing naked
17 for photographs?
18 A No.
19 Q Did Ms. Roberts ever mention Ghislaine Maxwell,
20 my client?
21 A If she did, I don't remember the name. Like I
22 said, I only remember Jeff. That name is all I really
23 remember.
24 Q Because you don't remember Ms. Maxwell's name, I
25 assume you don't remember Ms. Roberts telling you that

1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, Karla Layfield, RMR, Stenographic Court

5 Reporter, do hereby certify that I was authorized to and

6 did stenographically report the foregoing deposition of

7 James Michael Austrich; that said witness was duly sworn

8 to testify truthfully; and that the foregoing pages,

9 numbered 1 through 145, inclusive, constitute a true and

10 correct record of the testimony given by said witness to

11 the best of my ability.

12 I FURTHER CERTIFY that I am not a relative or

13 employee or attorney or counsel of any of the parties

14 hereto, nor a relative or employee of such attorney or

15 counsel, nor am I financially interested in the action.

16 WITNESS MY HAND this ___ day of June, 2016, at

17 Ocala, Marion County, Florida.

18

19 ______________________________
Karla Layfield, RMR

20 Stenographic Court Reporter

21

22

23

24

25

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that James

5 Michael Austrich personally appeared before me and was

6 duly sworn on the 23rd day of June, 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this _____ day

8 of June, 2016.

9

10

11 ________________________________
Karla Layfield, RMR
Notary Public

12 State of Florida at Large
My Commission No. FF942806

13 My Commission Expires 12/10/2019

14

15 ____Personally Known
____Professionally Known

16 X Produced Identification of FDL
Exp. 07/9/80

17

18

19

20

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24

25

EXHIBIT M

UNITED STATES DEPARTMENT OF STATE

APPLICATION FOR ☐ PASSPORT ☐ REGISTRATION

(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle) VIRGINIA Lee

LAST Roberts

112487073

2. MAIL PASSPORT TO: STREET / RFD # OR P.O. BOX APT. #

☐ 5 Yr. ☐ 10 Yr. Issue Date JAN 12 2001

STATE FL

Loxahatchee

R D O DP

End. # 21 Exp. 1-10-02

ZIP CODE 33470 COUNTRY / IN CARE OF (if applicable) USA

3. SEX ☐ M ☑ F

4. PLACE OF BIRTH (City & State or City & Country) Sacramento California

5. DATE OF BIRTH

6. SOCIAL SECURITY NUMBER (SEE FEDERAL TAX LAW NOTICE ON PAGE 2)

Personal Information

7. HEIGHT Feet Inches 5 7

8. HAIR COLOR Blonde

9. EYE COLOR Blue Green

11. BUSINESS TELEPHONE (Cell)

12. OCCUPATION Massage

13. PERMANENT ADDRESS (DO NOT LIST P.O. BOX) STREET/RFD # CITY Loxahatchee STATE FL ZIP CODE 33470

14. FATHER'S FULL NAME Last Roberts First Sky BIRTHPLACE California CITIZEN ☐ Yes ☐ No

15. MOTHER'S FULL MAIDEN NAME Last Crowel First Lynn Roberts BIRTHPLACE CITIZEN ☐ Yes ☐ No

16. HAVE YOU EVER BEEN MARRIED? ☐ Yes ☑ No

SPOUSE'S OR FORMER SPOUSE'S FULL NAME AT BIRTH Last First BIRTHPLACE CITIZEN ☐ Yes ☐ No

DATE OF MOST RECENT MARRIAGE Month Day Year

WIDOWED/DIVORCED? ☐ Yes Give Date Month Day Year ☐ No

17. OTHER NAMES YOU HAVE USED (1) (2)

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT? ☐ Yes ☒ No IF YES, COMPLETE NEXT LINE AND SUBMIT PASSPORT IF AVAILABLE. DISPOSITION ☐ Submitted ☐ Stolen ☐ Lost ☐ Other

NAME IN WHICH ISSUED MOST RECENT PASSPORT NUMBER APPROXIMATE ISSUE DATE Month Day Year



It is necessary to submit a statement with an application for a new passport when a previous valid or potentially valid passport cannot be presented. The statement must set forth in detail why the previous passport cannot be presented. Use Form DSP-64.

19. EMERGENCY CONTACT. If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.

NAME James Austrich

TELEPHONE RELATIONSHIP Friend

20. TRAVEL PLANS (not mandatory) Month Day Year

Date of Trip 01 13 01

Length of Trip 01/21/01

COUNTRIES TO BE VISITED London

21. STOP. DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH. I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form (unless explanatory statement is attached). I solemnly swear (or affirm) that the statements made on this application are true and the photograph attached is a true likeness of me.

X Parent's/Legal Guardian's Signature (if identifying minor child)

X Virginia Roberts Applicant's Signature - age 13 or older

22. FOR ACCEPTANCE AGENT'S USE

Subscribed and sworn to (affirmed) before me

FOIA: (b)(6)

(Signature of person authorized to accept application)

Month Day Year (SEAL) ☐ Clerk of Court, Location ☐ PASSPORT Agent ☐ Postal Employee ☐ (Vice) Consul USA

23. APPLICANT'S IDENTIFYING DOCUMENTS

☒ DRIVER'S LICENSE ISSUE DATE Month Day Year EXPIRATION DATE Month Day Year 05 14 05 ID No.

☐ PASSPORT

☐ OTHER (Specify) PLACE OF ISSUE: FL ISSUED IN THE NAME OF: Virginia Roberts

24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)

☐ Birth Certificate SR CR City Filed/Issued:

☐ Passport Bearer's Name:

☐ Report of Birth

☐ Naturalization/Citizenship Cert. No. Issued:

☐ Other:

☐ Seen & Returned

☐ Attached

FOIA: (b)(6)

25. FEE EXEC EF OTHER

FORM DSP-11 (12-97) (SEE INSTRUCTIONS ON PAGE 2) Page 1 Form Approved OMB No. 1405-0004 (Exp. 5/31/2001) Estimated Burden - 20 Minutes*

EXHIBIT N

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

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LEHRMAN, P.L.
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6 Appearing on behalf of the
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7
Also Present:
8 Brenda Rodriguez, Paralegal
Nicholas F. Borgia, CLVS Videographer
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1 Pursuant to Notice and the Federal Rules
2 of Civil Procedure, the VIDEOTAPED DEPOSITION OF
3 VIRGINIA GIUFFRE, called by Defendant, was taken on
4 Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150
5 East 10th Avenue, Denver, Colorado, before Kelly A.
6 Mackereth, Certified Shorthand Reporter, Registered
7 Professional Reporter, Certified Realtime Reporter
8 and Notary Public within Colorado.
9
* * * * * * *
10 I N D E X
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EXAMINATION PAGE
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14 PRODUCTION REQUEST(S):
15 (None.)
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2 DESCRIPTION INITIAL REFERENCE
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1 January 19th, 2015?
2 A At the very top of the page it says
3 January 21st, 2015.
4 Q The date it was filed. Is there a date
5 just above the signature block?
6 A Oh, yes, sorry. Yes, there is.
7 Q And what date -- what date was that?
8 A The 19th day of January, 2015.
9 Q Okay. And this document is something that
10 you believe contains the truth, correct?
11 A To the best of my knowledge at the time,
12 yes.
13 Q All right. Did something change between
14 the time then and today that makes you believe that
15 it's not all accurate?
16 A Well, as you can see, in line 4 on page 1,
17 I wasn't aware of my dates. I was just doing the
18 best to guesstimate when I actually met them.
19 Since then I've been able to find out that
20 through my Mar-a-Lago records that it was actually
21 the summer of 2000, not the summer of 1999.
22 Q Oh, I'm sorry. Are you back on page 1?
23 A On the first page.
24 Q Okay.
25 A Yes.

1 Q And you're talking about line 4?
2 A Line 4.
3 Q Paragraph 4 or line 4?
4 A Oh, sorry. Number 4, the paragraph
5 number 4.
6 Q Okay. And what part of paragraph 4 do you
7 now believe to be untrue?
8 A In approximately --
9 MR. EDWARDS: Object to the form.
10 You can answer.
11 A In approximately 1999 when I was 15 years
12 old I met Ghislaine Maxwell.
13 Q (BY MS. MENNINGER) Okay.
14 A I now know that it was 2000, that I was 16
15 years old when I met Ghislaine Maxwell.
16 Q So when you signed this document under
17 penalty of perjury stating that it was true, you no
18 longer believe that to be true, correct?
19 A It was an honest mistake. We had no idea
20 how to pinpoint without any kind of records or dates
21 or anything like that. I was just going back
22 chronologically through time. And that's the best
23 time that I thought it was. And now I know the
24 facts, so it's good to know.
25 Q So you now believe that a document you

1 filed under oath is no longer true, correct?
2 MR. EDWARDS: Object to the form.
3 A I wouldn't say that it wasn't true. I was
4 just unaware of the times and the dates.
5 Q (BY MS. MENNINGER) Again, is there more
6 than one truth, Ms. Roberts?
7 A No, there's no more than one truth.
8 Q All right. So a document in which you
9 swore that you were 15 years old when you met
10 Ms. Ghislaine Maxwell is an untrue statement,
11 correct?
12 MR. EDWARDS: Object to the form.
13 A It's not that it's an untrue statement.
14 It was a mistake. So it wasn't intentionally trying
15 to say something that wasn't true. It was to my best
16 knowledge that I thought it was 1999. And when I got
17 my records from Mar-a-Lago I was able to find out
18 that it was 2000. And this was entered before I
19 found out the actual dates that I did work at
20 Mar-a-Lago.
21 Q (BY MS. MENNINGER) Okay. So a document
22 that you filed under oath --
23 A Um-hum.
24 Q -- is now, you believe to be untrue,
25 correct?

1 MR. EDWARDS: Objection. Asked and
2 answered.
3 Q (BY MS. MENNINGER) You may answer.
4 MR. EDWARDS: Answer again.
5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.
10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.
13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?
16 A I would say it was mid-2015.
17 Q Mid-2015 is the first time you became
18 aware of the dates --
19 A I don't know the exact --
20 Q If you could just let me finish.
21 A I'm sorry.
22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?
25 A That's correct. Sorry.

1 a lot of the circumstances that I had been subjected
2 to, I decided I wanted to get my GED.
3 Q Okay. So you were going to an actual
4 school to get your GED, that's what you're saying?
5 A Yes.
6 Q And that school, whatever it was, where
7 you were getting your GED was not Palm Beach High
8 School, right?
9 A No.
10 Q And it -- whatever the school was where
11 you were getting your GED took a summer break?
12 A I believe so, yes.
13 Q And that was in 2000?
14 A Now that we know the right dates, yes.
15 Q And that's when your dad helped you get a
16 quote-unquote summer job?
17 A Yes.
18 Q All right. And that summer job was
19 Mar-a-Lago?
20 A Yes.
21 Q Okay. Now tell me how you sort of came
22 into Mar-a-Lago for the first time? He asked you to
23 come? They called you? What happened?
24 A My dad was very liked there. So I think
25 he talked to the people who were in HR. And then

1 mic higher up on your jacket, please?
2 THE DEPONENT: Sure.
3 THE VIDEOGRAPHER: Thank you.
4 THE DEPONENT: Tell me if that's okay.
5 Better?
6 A Okay. Page 40?
7 Q (BY MS. MENNINGER) Right. Do you see the
8 first full paragraph on that page?
9 A I do.
10 Q The first line begins: I spent my sweet
11 16th birthday on his island in the Caribbean next to
12 Little (sic) St. James Isle. He liked to call it
13 Little St. Jeff's. His ego was enormous as his
14 appetite for fornicating.
15 Do you see that sentence?
16 A I do.
17 Q That is not true, correct? You were not
18 spending your sweet 16th birthday on Little St. James
19 Isle, correct?
20 A Based on my knowledge at the time that I
21 wrote this manuscript, I thought I did spend my 16th
22 birthday there. And so I put it down in there as
23 that. Now I know that it wasn't my 16th birthday.
24 Q Or your sweet 16th birthday?
25 A Well, we --

1 MR. EDWARDS: Object to the form.
2 Harassing.
3 Q (BY MS. MENNINGER) Was it your sweet 16th
4 birthday?
5 A Is it not custom to call your 16th
6 birthday sweet? Have you never heard that saying
7 before?
8 Q Was it your sweet 16th birthday,
9 Ms. Giuffre?
10 A As we --
11 MR. EDWARDS: She's answered the question.
12 It's been asked and answered.
13 MS. MENNINGER: She asked me a question,
14 actually. You're not testifying here.
15 Q (BY MS. MENNINGER) Was it your sweet 16th
16 birthday?
17 A As I thought, in the manuscript when I
18 wrote it, I thought it was my sweet 16th birthday.
19 Q Okay. Now that you know it wasn't, where
20 did you spend your sweet 16th birthday?
21 A Well, I don't know.
22 Q Well, just give us your best guess.
23 MR. EDWARDS: Objection. And she's not
24 going to guess today. She's going to tell you the
25 answers as she remembers them.

1 A Again, I don't know.
2 Q Do you recall any present you actually got
3 on your sweet 16th birthday?
4 A No, I don't. I don't know where I spent
5 it, who I spent it with or what I got. I'm sorry.
6 Q How long did you work at Mar-a-Lago?
7 A Best of my recollection, it was a summer
8 job. I believe I started in June. And I think I
9 only worked there approximately two weeks, two, three
10 weeks.
11 Q How many hours a week did you work?
12 A I want to say it was a -- I want to say
13 it's a full-time job.
14 Q Do you recall it being a full-time job?
15 A It was a summer job, but just thinking
16 back, my dad used to bring me in and bring me home.
17 So he worked full time, all day. So -- and I didn't
18 lounge around Mar-a-Lago so, yes, I think it would
19 have been a full-time job.
20 Q And how much did you make per hour?
21 A Approximately, I think I remember making
22 $9 an hour.
23 Q The bracelet and earrings you got for your
24 birthday, some birthday, on Little -- or where was
25 that birthday party, at Little St. James?

1 Q Which brother?
2 A Sky.
3 Q What about your other brother?
4 A I think he had moved out by then.
5 Q What forms of communication did you have?
6 Just a home phone number, or what?
7 A Yeah, there was a home phone.
8 Q When do you recall ever getting a cell
9 phone?
10 A The first cell phone I ever got was the
11 one that Ghislaine gave to me.
12 Q So you never had -- your parents, did they
13 have ones when you were working at Mar-a-Lago?
14 A No, my dad used to -- like, we had phones
15 in the spa and maintenance area and so on, so forth.
16 And you could, so to speak, page people from around
17 the courts.
18 Q Okay. So tell me what you recall of the
19 first conversation that you had with Ghislaine
20 Maxwell.
21 A I'm sitting there reading my book about
22 massage therapy, as I'm working in the spa. And I'm
23 getting my GE -- well, I was in the process of
24 getting my GED before I went to my summer job. I
25 decided that I would like to become a massage

1 A Yes.
2 Q Who else was at home when you got home?
3 A My mom, my dad and my brother.
4 Q Which brother?
5 A Sky.
6 Q And anyone else who was there at the time?
7 A I believe Michael might have been living
8 with me at that time. So he might have been there.
9 Q Do you recall if he was there when you got
10 home?
11 A I don't really remember. I remember what
12 I did when I got home, that I basically made a
13 beeline for the bathroom.
14 Q Let me ask you a question. Michael was
15 living with you at that home, at your parents' home
16 at the time, is your best recollection today; is that
17 right?
18 A That's my best recollection, yes.
19 Q When you say living with you, were you
20 guys staying in the same room?
21 A Yes.
22 Q Were you engaged at that time to him?
23 A That was a really weird relationship. He
24 was a friend who looked after me, and he did propose
25 to me and I did say yes. But my heart was never in

1 it.

2 He was somebody that helped me off the

3 streets so I felt compelled to say yes to him.

4 Q Okay. So when he proposed to you and you

5 said yes, did that take place before you started

6 working at Mar-a-Lago or after you started working at

7 Mar-a-Lago?

8 A Before.

9 Q And so if he were living with your parents

10 at that time, you were living in the same room; is

11 that correct?

12 A I believe so.

13 Q And your parents understood him to be your

14 fiance?

15 A I don't think they agreed with it, but I

16 think they understood it as that. I mean --

17 Q I mean, you communicated to them that he

18 had proposed and you had accepted?

19 A Yeah, in not such a pretty way. I mean,

20 they obviously weren't very happy about it. And it

21 wasn't my true intentions to ever marry him.

22 Q Okay.

23 A But I did it to make him feel okay. I

24 didn't want to be mean.

25 Q What did your mom say about your

1 know where it was when she said to go do this.
2 Q (BY MS. MENNINGER) Okay. Where were you
3 sent to have sex with the owner of a large hotel
4 chain by Ghislaine Maxwell?
5 MR. EDWARDS: Object to the form.
6 A I believe that was one time in France.
7 Q (BY MS. MENNINGER) Which time in France?
8 A I believe it was around the same time that
9 Naomi Campbell had a birthday party.
10 Q Where did you have sex with the owner of a
11 large hotel chain in France around the time of Naomi
12 Campbell's birthday party?
13 A In his own cabana townhouse thing. It was
14 part of a hotel, but I wouldn't call it a hotel.
15 Jeffrey was staying there. Ghislaine was
16 staying there. Emmy was staying there. I was
17 staying there. This other guy was staying there. I
18 don't know his name.
19 I was instructed by Ghislaine to go and
20 give him an erotic massage.
21 Q She used the words erotic massage?
22 A No, that's my word. The word massage is
23 what they would use. That's their code word.
24 Q Was she in the room when you gave this
25 erotic massage to the owner of a large hotel chain?

1 A No, she was not in the room. She was in
2 another cabana.
3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?
7 A Not at the time, no.
8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?
11 MR. EDWARDS: Object to the form.
12 A I don't know.
13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?
15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.
18 Q And when was that?
19 A I don't know.
20 Q Do you have any time of year?
21 A No.
22 Q Do you know how old you were?
23 A No.
24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?
4 A I am definitely sure there is. But can I
5 remember everybody's name? No.
6 Q Okay. Can you remember anything else
7 about them?
8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.
13 Q Do you have any notes of all these people
14 that you were sent to?
15 A No, I don't.
16 Q Where are your notes?
17 A I burned them.
18 Q When did you burn them?
19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.
21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?
24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.
4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?
7 MR. EDWARDS: Object to the form.
8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.
11 Q (BY MS. MENNINGER) When did you write
12 that journal?
13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.
16 Q So you did not write this journal at the
17 time it happened?
18 A No.
19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?
22 A Yes.
23 Q And you started writing a journal after
24 you had a lawyer, correct?
25 A Correct.

1 Q Including Mr. Edwards, who is sitting
2 right here, correct?
3 A Correct.
4 Q What did that journal look like?
5 A It was green.
6 Q And what else?
7 A It was just a spiral notebook.
8 Q Okay. And what did you put into that
9 green spiral notebook?
10 A Bad memories. Things that I've gone
11 through, lots of things, you know. I can't tell you.
12 There was a lot of pages. It was over 300 pages in
13 that book.
14 Q Did you ever show that book to your
15 lawyers?
16 A No.
17 Q Did you show that book to anyone?
18 A My husband.
19 Q Did you show it to anyone else besides
20 your husband?
21 A No.
22 Q Did you tear out pages and give them to
23 Sharon Churcher?
24 A No, I wrote -- those pages that you're
25 talking about, I wrote for her specifically. She

1 wanted to know about the Prince Andrew incident.
2 Q So that's a different piece of paper?
3 A Yeah, that's just random paper.
4 Q So you had a green spiral notebook that
5 you began sometime in 2011 or 2012 in which you wrote
6 down your recollections about what had happened to
7 you, and you burned that in a bonfire in 2013.
8 Did I get that right?
9 A You got that right.
10 Q And do you have no other names of people
11 to whom you claim Ghislaine Maxwell directed you to
12 have sex, correct?
13 A At this time, no.
14 Q Is there any document that would refresh
15 your recollection that you could look at?
16 A If you have a document you'd like to show
17 me, I would be glad to look at it and tell you the
18 names I recognize off of that.
19 Q I'm just asking you if there's a document
20 you know of that has this list of names in it?
21 A Not in front of me, no.
22 Q Where is the original of the photograph
23 that has been widely circulated in the press of you
24 with Prince Andrew?
25 A I probably still have it. It's not in my

1 other terms of his probationary period?
2 A No. He went to everything that he was
3 supposed to go to.
4 Q Has he paid his fines?
5 A Yes, as far as I know.
6 Q Describe for me the contract that you had
7 with the Mail On Sunday?
8 A Could you be a little bit more specific?
9 Like --
10 Q Have you had more than one contract with
11 the Mail On Sunday?
12 A Well, there was one contract for the
13 picture. And that was to pay me 140,000 for the
14 picture. And then two stories were printed after
15 that for the amount of 10,000 each.
16 Q Is that the only money that you received
17 from the Mail On Sunday?
18 A Correct.
19 Q Did you receive any money for syndication
20 of the photograph?
21 A Isn't that what the 140 was for?
22 Q I'm asking you.
23 A Well, I don't really know what syndication
24 means.
25 Q Did you have a written contract with the

1 Mail on Sunday?
2 A Yes.
3 Q Where is that contract right now?
4 A I don't know. I've moved that many times.
5 I -- I lose paperwork wherever I go.
6 Q Is it possible it's in the boxes in
7 Sydney?
8 A I don't think I kept it, to be honest.
9 Q Did you ever refer back to it after you
10 signed it?
11 A I know I kept it for a short while, but I
12 mean, like I said, I've moved countries twice in the
13 last two years and three different houses. So the
14 paper trail is lost. I don't know where it would be.
15 Q Did you receive it via e-mail?
16 A No. I received it -- Sharon Churcher
17 handed it to me by paper.
18 Q And you signed it?
19 A I signed it.
20 Q And then did you make a copy of it?
21 A No.
22 Q You never had a copy of it?
23 A Well, I had my own copy. I'm sure she has
24 hers.
25 Q Do you recall there being a period of

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify

5 that I am a Registered Professional Reporter and

6 Notary Public within the State of Colorado; that

7 previous to the commencement of the examination, the

8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was

10 taken in shorthand by me at the time and place herein

11 set forth, that it was thereafter reduced to

12 typewritten form, and that the foregoing constitutes

13 a true and correct transcript.

14 I further certify that I am not related to,

15 employed by, nor of counsel for any of the parties or

16 attorneys herein, nor otherwise interested in the

17 result of the within action.

18 In witness whereof, I have affixed my

19 signature this 11th day of May, 2016.

20 My commission expires April 21, 2019.

21

22

23 Kelly A. Mackereth, CRR, RPR, CSR
216 - 16th Street, Suite 600
Denver, Colorado 80202

24

25

EXHIBIT O

Page: 1 Document Name: untitled

PANEL: ___ A07. ASSIGNMENT HISTORY YEAR: 16
T234 Monday May 23, 2016 9:04 am
STDT: 12870606 ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A C	ENTRY CD	ENTRY DATE	OD	WITHDRAWAL CD	WITHDRAWAL DATE	P R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	E Y
_	R02	101201	__	W26	030702	N	_	02	01	__	3390	SURVIVORS	10	56	31	___	Y
_	R02	092001	__	W02	101101	N	_	02	01	__	2331	ROYAL PALM HIG	10	13	1	___	_
_	EA1	081401	__	W32	092001	Z	_	02	A1	__	2192	WLLNGTN HS ADL	30	___	___	___	_
_	EA1	081600	__	W47	081301	Z	_	01	A1	__	2192	WLLNGTN HS ADL	30	___	___	___	Y
_	EA1	062100	__	W47	081500	Z	_	00	A1	__	2192	WLLNGTN HS ADL	30	___	___	___	Y
_	E01	081699	__	W03	081699	N	_	00	01	__	2331	ROYAL PALM HIG	10	___	___	___	_
_	E01	081998	__	W02	060999	P	_	99	01	__	0581	FOREST HILL HI	09	155	25	___	Y
_	E01	082097	__	W01	061098	R	_	98	01	__	2331	ROYAL PALM HIG	09	147	33	___	Y
_	E01	082097	__	W22	082097	N	_	98	01	__	2191	WELLINGTON HIG	09	___	___	___	_
_	R03	040797	__	W02	061197	P	_	97	01	__	1691	CRESTWOOD MID	08	40	5	___	Y
_	E01	082294	__	DNE	082294	N	_	95	01	__	1703	ROYAL PINES SC	06	___	___	___	_
_	E01	082393	__	W02	061094	P	_	94	01	__	1901	LOXAHATCHEE EL	05	167	13	___	Y
_	E01	082592	__	W01	061193	P	_	93	01	__	1901	LOXAHATCHEE EL	04	176	4	___	Y

PF1=HELP 3=EXIT 5=REFRESH 7=BKWD 8=FWD 9=NEXT PAGE 12=ESCAPE
PAGE FULL...CONTINUE. TERML: I1B5

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 DEMOGRAPHIC INFORMATION FILE: SRTS12IS
CURRENT DISTRICT: 50 PALM BEACH PAGE 1
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L
MAILING ADDRESS: 12959 RACKLEY RD
LOXAHATCHEE FL 33470
DISTRICT STUDENT ID: 12870606 FL STUDENT ID-ALIAS: [redacted]
PARENT/GUARDIAN (NAME/CODE):
SKY ROBERTS PARENT
LYNN ROBERTS PARENT

(561) 712-1800
1310 N CONGRESS AVE
WEST PALM BEACH FL 33409
MIGRANT STUDENT ID: 00000000000
RACIAL/ETHNIC CATEGORY: W SEX: F
[redacted] BIRTH VERIFICATION: 1
BIRTHPLACE: SACRAMENTO CA

IMMUNIZATION STATUS: PERMANENT IMMUNIZATION CERTIFICATE
VACCINE STATUS, DATE- VACCINE CERTIFICATE EXPIRATION DATE:

TYPE	DOSE	DATE	DOSE	DATE	DOSE	DATE	DOSE	DATE	DOSE	DATE
DTP	1	11/02/1983	2	02/03/1984	3	04/27/1984	4	04/24/1987	5	09/27/1988
TD	1	06/24/1997								
POLIO	1	11/02/1983	2	02/03/1984	3	04/24/1987	4	09/27/1988		
HIB	1	04/24/1987								
MMR	1	04/24/1987	2	04/18/1997						
MEASLES	1	04/24/1987								
HEP B 3DOSE	1	04/18/1997	2	06/24/1997	3	09/08/1999				

------------------------------ COURSE INFORMATION ------------------------------

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1989-1990 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1989-1990 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1990-1991 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1990-1991 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1991-1992 GRADE LEVEL: 03

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	/EARN
3	5100090	THIRD GRADE			P	0.00	0.00
			CREDIT, TERM:			0.00	0.00

1991-1992 ANNUAL DAYS-PRESENT: 180 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1992-1993 GRADE LEVEL: 04

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	/EARN
3	5100100	FOURTH GRADE			P	0.00	0.00
			CREDIT, TERM:			0.00	0.00

1992-1993 ANNUAL DAYS-PRESENT: 176 ABSENT: 4
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
C. Hatchelt
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COURSE INFORMATION
CURRENT DISTRICT: 50 PALM BEACH
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

FILE: SRTS12IS
PAGE 2

LEGAL NAME: ROBERTS, VIRGINIA L

(561) 712-1800

DISTRICT: 50 SCHOOL: 1901 LOXAHATCHEE GROVES ELEM.
YEAR: 1993-1994 GRADE LEVEL: 05

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	CREDIT EARN
3	5100110	FIFTH GRADE			P	0.00	0.00
3	5100110	FIFTH GRADE			P	0.00	0.00
		CREDIT, TERM:				0.00	0.00

1993-1994 ANNUAL DAYS-PRESENT: 167 ABSENT: 13
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1994-1995 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1994-1995 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

DISTRICT: 50 SCHOOL: 1691 CRESTWOOD MIDDLE
YEAR: 1996-1997 GRADE LEVEL: 08

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	CREDIT EARN
2	0400010	M/J DRAMA 2			A	0.00	0.00
2	8500240	TEEN CHALLENGES			C	0.00	0.00
3	1001070	M/J LANG ARTS 3			C	0.00	0.00
3	1205070	M/J MATH 3			D	0.00	0.00
3	2002100	M/J COMPRE SCI 3			C	0.00	0.00
3	2103050	M/J FLOR:CHA AND CHO			C	0.00	0.00
		CREDIT, TERM:				0.00	0.00

1996-1997 ANNUAL DAYS-PRESENT: 40 ABSENT: 5
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 2331 ROYAL PALM BEACH COMM HIG
YEAR: 1997-1998 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	CREDIT EARN
1	0708340	SPANISH 1	FL	RJ	F	0.50	0.00
1	1001310	ENG 1	EN	RJ	D	0.50	0.50
1	1200370	ALGEBRA IA	MA	JR	F	0.50	0.00
1	1503400	BEG AEROBICS	PE	J	F	0.50	0.00
1	2001310	ERTH/SPA SCI	SC	J	F	0.50	0.00
1	2100410	CARIBBEAN STUDIES	EL	J	F	0.50	0.00
1	8500355	NUTRITION & WELLNESS	VO		F	0.50	0.00
2	1001310	ENG 1	EN	RJ	A	0.50	0.50
2	1200370	ALGEBRA IA	MA	JR	B	0.50	0.50
2	1501300	PERS FIT	PE	RJ	A	0.50	0.50
2	2001310	ERTH/SPA SCI	SC	J	A	0.50	0.50
2	2103300	WORLD CULT GEOG	EL	J	B	0.50	0.50

DISTRICT: 50 SCHOOL: 9034 ESE - OTHER TEACHING SERV
YEAR: 1997-1998 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	CREDIT EARN
4	1200370	ALGEBRA IA	MA	JR	B	0.50	0.50
5	2001310	ERTH/SPA SCI	SC	J	A	0.50	0.50
		CREDIT, TERM:				7.00	4.00

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.8571	13.00	CUM:	1.8571	13.00
STATE-TERM:	1.8571	13.00	CUM:	1.8571	13.00

1997-1998 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
C. Hatchett
RECORDS CUSTODIAN

TO DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 COURSE INFORMATION
CURRENT DISTRICT: 50 PALM BEACH
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

FILE: SRTS12IS
PAGE 3

(561) 712-1800

LEGAL NAME: ROBERTS, VIRGINIA L

DISTRICT: 50 SCHOOL: 0581 FOREST HILL HIGH
YEAR: 1998-1999 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	CREDIT EARN
1	0500500	PERS,CAR,SCH DEV 1	EL		B	0.50	0.50
1	0701320	FRENCH 1	FL	RJ	C	0.50	0.50
1	1001340	ENG 2	EN	RJ	A	0.50	0.50
1	1200380	ALGEBRA IB	MA	JR	F	0.50	0.00
1	1900300	DRIVER ED CLASS	EL		B	0.50	0.50
1	2000310	BIOLOGY 1	SC	RJ	A	0.50	0.50
1	2109310	WORLD HIST	WH	RJ	C	0.50	0.50
2	0500500	PERS,CAR,SCH DEV 1	EL		F	0.50	0.00
2	0701320	FRENCH 1	FL	RJ	F	0.50	0.00
2	0800300	HEALTH1-LIF MGMT SKL	LM	RJ	F	0.50	0.00
2	1001340	ENG 2	EN	RJ	F	0.50	0.00
2	1200380	ALGEBRA IB	MA	JR	F	0.50	0.00
2	2000310	BIOLOGY 1	SC	RJ	F	0.50	0.00
2	2109310	WORLD HIST	WH	RJ	F	0.50	0.00
		CREDIT, TERM:				7.00	3.00

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.2857	9.00	CUM:	1.5714	22.00
STATE-TERM:	1.2857	9.00	CUM:	1.5714	22.00

1998-1999 ANNUAL DAYS-PRESENT: 155 ABSENT: 25
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1999-2000 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 2000-2001 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
YEAR: 2001-2002 GRADE LEVEL: 10

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	GRD	CREDIT ATT.	CREDIT EARN
1	0500530	PERS,CAR,SCH DEV 4	EL		C	0.50	0.50
1	1001440	BUSINESS ENG 1	EN	J	B	0.50	0.50
1	1205370	CONSUMER MATH	MA	C	C	0.50	0.50
1	8300310	WORKPLACE ESSENTIALS	VO		B	0.50	0.50
1	8301610	WORK EXP 1	VO		F	0.50	0.00
1	8301650	WORK EXP-OJT	VO		F	1.00	0.00
		CREDIT, TERM:				3.50	2.00

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

2001-2002 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA

APR 1 2008

C. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008

SCHOOL: 3390 GRADUATION SUMMARY FILE: SRTS121S
CURRENT DISTRICT: 50 PALM BEACH PAGE 4
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

****** C U M U L A T I V E S U M M A R Y ******
AS OF: 03/31/2008

GRADUATION OPTION: 4-YR STANDARD

SUBJECT AREA	CREDITS TOTAL TO DATE	TOTAL NEEDED	TOTAL REMAINING
ENGLISH (EN)	2.00	4.00	2.00
MATHEMATICS (MA)	1.50	3.00	1.50
SCIENCE (SC)	1.50	3.00	1.50
AMER HISTORY (AH)	0.00	1.00	1.00
WORLD HISTORY (WH)	0.50	1.00	0.50
ECONOMICS (EC)	0.00	0.50	0.50
AMER GOVERNMENT (AG)	0.00	0.50	0.50
VOCATIONAL/ (VO/	0.50		
PERFORM FINE ART (PF)	0.00	1.00*	0.50*
LIFE MGMT SKILLS (LM)	0.00	0.50	0.50
PHYSICAL ED (PE)	0.50	0.50	0.00
FOREIGN LANGUAGE (FL)	0.50		0.00
LANGUAGE ARTS (LA)	0.00		
SOCIAL STUDIES (SS)	0.00		
ELECTIVE (EL)	2.00	9.00	6.50
ESE (EX)	0.00		
COMPUTER ED (CE)	0.00		
CREDITS, CUMULATIVE:	9.00	24.00	15.00

* TOTALS INCLUDE VOCATIONAL & PERFORM FINE ARTS*

DISTRICT: GPA 1.5429 QTY PTS 27.00 STATE: GPA 1.5429 QTY PTS 27.00

+CERTIFIED BY:

+SIGNATURE: ______________________

+DATE: ______________

VOCATIONAL PROGRAM COMPLETION STATUS-
NUMBER: 8500355 NUTRITION & WELLNESS
TERMINATION: IN PROGRESS COMPLETED:
VOCATIONAL PROGRAM COMPLETION STATUS-
NUMBER: 8300310 WORKPLACE ESSENTIALS
TERMINATION: IN PROGRESS COMPLETED:
VOCATIONAL PROGRAM COMPLETION STATUS-
NUMBER: 8301610 WORK EXP 1
TERMINATION: IN PROGRESS COMPLETED:
VOCATIONAL PROGRAM COMPLETION STATUS-
NUMBER: 8301650 WORK EXP-OJT
TERMINATION: IN PROGRESS COMPLETED:

DISTRICT CLASS RANK- EFFECTIVE DATE: 03/06/2002
CLASS RANK, NUMERICAL POSITION: 65
CLASS RANK, PERCENTILE: 70
CLASS RANK, TOTAL NUMBER IN CLASS: 214

DATE PASSED ASSESSMENT TEST FOR GRADUATION PURPOSES
COMMUNICATIONS: 10/2001
MATHEMATICS: 01/2002

COMMUNITY SERVICE HOURS: 0 REQUIREMENT MET: N

OFFICIAL TRANSCRIPT
THE SCHOOL DISTRICT OF
PALM BEACH COUNTY, FLORIDA
APR 1 2008
C. Hatchett
RECORDS CUSTODIAN

TO - DISTRICT: 0000050 PALM BEACH   SCHOOL: 3390 COMMENTS   FILE: SRTS12IS
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008   CURRENT DISTRICT: 50 PALM BEACH   PAGE 5
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L   (561) 712-1800

DEFINITION OF TERM CODES

CODE	DEFINITION	CODE	DEFINITION	CODE	DEFINITION	CODE	DEFINITION	CODE	DEFINITION
1	SEMESTER 1	S	COMBINED SUMMER SESSION	B	TRIMESTER 1	E	QUINMESTER 1	J	SIX WEEKS 1
2	SEMESTER 2			C	TRIMESTER 2	F	QUINMESTER 2	K	SIX WEEKS 2
3	ANNUAL	T	INTERSESSION 1*	D	TRIMESTER 3	G	QUINMESTER 3	L	SIX WEEKS 3
4	SUMMER SESSION 1	U	INTERSESSION 2*	6	QUARTER 1	H	QUINMESTER 4	M	SIX WEEKS 4
5	SUMMER SESSION 2	V	INTERSESSION 3*	7	QUARTER 2	I	QUINMESTER 5	N	SIX WEEKS 5
R	SHORT COURSE**	W	INTERSESSION 4*	8	QUARTER 3	Y	YEAR OF NONENROLLMENT***	O	SIX WEEKS 6
		X	INTERSESSION 5*	9	QUARTER 4				

* USED (INSTEAD OF SUMMER SCHOOL SESSIONS) WITH YEAR-ROUND SCHOOL RECORDKEEPING
** USED ONLY FOR WORKFORCE DEVELOPMENT EDUCATION (ADULT GENERAL AND POSTSECONDARY VOCATIONAL EDUCATION)
*** USED ONLY FOR REPORTING STUDENTS WHO HAVE WITHDRAWN BETWEEN SCHOOL YEARS

STATE GRADING SCALE FOR HIGH SCHOOL STUDENTS (REGARDLESS OF ENTRY DATE) EFFECTIVE SCHOOL YEAR 1997-1998

GRADING SCALE, EFFECTIVE 07/01/2001

GRADE	GRADE EQUIVALENT	QUALITY POINTS	GRADE	GRADE EQUIVALENT	QUALITY POINTS	GRADE	GRADE EQUIVALENT	QUALITY POINTS
A =	90 - 100	4.00	B =	80 - 89	3.00	C =	70 - 79	2.00
D =	60 - 69	1.00	F =	0 - 59	0.00			

GRADING SCALE, PRIOR TO 07/01/2001

GRADE	GRADE EQUIVALENT	QUALITY POINTS	GRADE	GRADE EQUIVALENT	QUALITY POINTS	GRADE	GRADE EQUIVALENT	QUALITY POINTS
A =	94 - 100	4.00	B =	85 - 93	3.00	C =	77 - 84	2.00
D =	70 - 76	1.00	F =	0 - 69	0.00			

NOTE: FROM THE 1987-1988 THROUGH THE 1996-1997 SCHOOL YEARS, FOR STUDENTS ENTERING HIGH SCHOOL DURING THESE YEARS, THE GRADE EQUIVALENTS FOR C, D, AND F WERE: C = 75-84, D = 65-74, AND F = 0-64; QUALITY POINTS AND ALL OTHER GRADES WERE THE SAME AS THOSE SHOWN IN THE IMMEDIATELY PRECEDING STATE GRADING SCALE.

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TO - DISTRICT: 0000050 PALM BEACH              SCHOOL: 3390  COMMENTS                   FILE: SRTS12IS
GRADE LEVEL: 10  PREPARED DATE: 03/31/2008   CURRENT DISTRICT: 50 PALM BEACH                  PAGE  6
                                               CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L                                (561) 712-1800

------------------------------------- STATE DEFINED COURSE FLAGS --------------------------------------
E=ACADEMIC SCHOLAR-ELECTIVE        R=ACADEMIC SCHOLAR-REQUIREMENT        9=NINTH GRADER
G=GIFTED                           H=HONORS                              N=NO CREDIT
I=INCLUDE IN GPA                   X=EXCLUDE FROM GPA                    W=EXCLUDE FROM STATE GPA
P=COURSE IS IN PROGRESS            S=CREDIT AWARDED BY SLEP EXAM         T=TRANSFERRED COURSE

VOCATIONAL SUBSTITUTION COURSES-                                         &=JROTC AIR FC SUB FOR LIFE MGMT
$=JOURNALISM SUB FOR PRAC ARTS     0=JROTC SUB FOR PRACTICAL ARTS        1=COMP ED SUB FOR PRACTICAL ARTS
2=SUB FOR BUS EN I 1001440         3=SUB FOR BUS EN I 1001440/II 1001450 4=SUB FOR MA I 1205540
5=SUB FOR MA I 1205380/II 1205390 6=SUB FOR GEN SCI 2002310             7=SUB FOR ANAT PHYSIO 2000350
8=SUB FOR PRE ALGEBRA 1200300      A=JROTC CST GD SUB FOR SCIENCE        F=JROTC AIR FC SUB FOR SCIENCE
K=JROTC NAVY SUB FOR SCIENCE       O=JROTC ARMY SUB FOR LIFE MGMT        Q=JROTC MARINE SUB FOR LIFE MGMT
@=SUB FOR BIO TECH 2000430         #=SUB FOR ENV SCI 2001340             %=SUB FOR PHY SCI 2003310
*=SUBSTITUTE FOR COURSE SPECIFIED ON FOLLOWING LINE ON COURSE LIST

ELL INSTRUCTION-
M=HOME LANGUAGE INSTRUCTION        B=HOME LANGUAGE &/OR ESOL INSTRUCTION (ELEMENTARY SELF-CONTAINED)
D=ESOL INSTRUCTION

------------------------------------- FY 1991-1992 COMMENTS ----------------------------------------
        THE PALM BEACH COUNTY SCHOOL DISTRICT AWARDS THE HIGH SCHOOL VALIDICTORIAN
        AND SALUTATORIAN USING A WEIGHTED GPA AVERAGE THAT IS BASED ON COURSES TAKEN
        IN GRADES 9 - 12.  HOWEVER, THE DISTRICT GPA INCLUDES ALL CREDIT COURSES.
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TO - DISTRICT: 0000050 PALM BEACH — SCHOOL: 3390 CATEGORY B INFORMATION — FILE: SRTS12IS
[redacted] : 03/31/2008 — CURRENT DISTRICT: 50 PALM BEACH — PAGE 7
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L — (561) 712-1800

WITHDRAWAL-DATE: 03/07/2002 CODE: W26

HOME LANGUAGE SURVEY DATE: 06/15/2000 — COUNTRY OF BIRTH: US UNITED STATES
NATIVE LANGUAGE: EN ENGLISH — PRIMARY HOME LANGUAGE: EN ENGLISH

HEALTH EXAMINATION, SCHOOL ENTRY: Y SCHOOL ENTRY HEALTH EXAMINATION CERTIFIED.

---------- EXCEPTIONAL STUDENT INFORMATION ----------

STUDENT PLAN DATE: 05/11/1999 CURRENT EVALUATION/RE-EVALUATION DATE: 05/11/2002
PRIMARY EXCEPTIONALITY: Z — FEFP PROGRAM:

---------- EXCEPTIONAL STUDENT PROGRAM INFORMATION ----------

EXCEPTIONALITY	PLACEMENT STATUS	REFERRAL DATE	EVALUATION COMPLETE DATE	ELGB DETERM DATE	PLACE-MENT DATE	DISMIS-SAL DATE
HOSPITAL/HOMEBOUND	ELIGIBLE AND PLACED	05/10/99	05/11/99	05/11/99	05/11/99	06/08/99
HOSPITAL/HOMEBOUND	ELIGIBLE AND PLACED	02/03/98	02/04/98	02/04/98	02/04/98	06/11/98

---------- DROPOUT PREVENTION PROGRAM INFORMATION ----------

DROPOUT PREVENTION PROGRAM	PLACEMENT REASONS	OUTCOMES
EDUCATIONAL ALTERNATIVE PROGRMS	ACADEMICALLY UNSUCCESSFUL	DOCUMNTD IMPRVD ACADMC PERFORMANCE
EDUCATIONAL ALTERNATIVE PROGRMS	ACADEMICALLY UNSUCCESSFUL	DOCUMNTD IMPRVD ACADMC PERFORMANCE
EDUCATIONAL ALTERNATIVE PROGRMS	ACADEMICALLY UNSUCCESSFUL	DOCUMNTD IMPRVD ACADMC PERFORMANCE

---------- TEST INFORMATION ----------

TEST INFORMATION:

GRD	TEST DATE	TEST NAME	LEVEL FORM	SUBJECT CONTENT	TYPE	SCORE	SCORE TYPE	SUBJECT CONTENT	TYPE	SCORE	SCORE TYPE	SUBJECT CONTENT	TYPE	SCORE	SCORE TYPE
30	06/16/2000	TAB	7 A	TOTBAT	GE	0000		MATH(T)	GE	0000		READ(T)	GE	0000	
				LANGUAGE	GE	0110									
30	06/15/2000	TAB	7 A	TOTBAT	GE	0000		MATH(T)	GE	0000		READ(T)	GE	0126	
				LANGUAGE	GE	0000									
30	06/15/2000	TAB	7 M	TOTBAT	GE	0000		MATH(T)	GE	0073		READ(T)	GE	0000	
				LANGUAGE	GE	0000									
09	04/20/1998	CTB	A 19	COMPREHE	SS	0801		COMPREHE	NP	0085		PROB/SLV	SS	0759	
				PROB/SLV	NP	0034		SCIENCE	SS	0000		SCIENCE	NP	0000	
				SS/ENVIR	SS	0000		SS/ENVIR	NP	0000					

TO - DISTRICT: 0000050 PALM BEACH SCHOOL: 3390 TEST INFORMATION FILE: SRTS121S
GRADE LEVEL: 10 PREPARED DATE: 03/31/2008 CURRENT DISTRICT: 50 PALM BEACH PAGE 8 OF 8
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L (561) 712-1800

TEST INFORMATION:

GRD	TEST DATE	TEST NAME	LEVEL FORM	SUBJECT CONTENT	SCORE TYPE	SCORE	SUBJECT CONTENT	SCORE TYPE	SCORE	SUBJECT CONTENT	SCORE TYPE	SCORE
08	04/15/1997	CTB	B 17	READ(T)	SS	0000	READ(T)	NP	0000	MATH(T)	SS	0000
				MATH(T)	NP	0000	COMPREHE	SS	0780	COMPREHE	NP	0077
				COMPUTAT	SS	0000	COMPUTAT	NP	0000	VOCAB	SS	0000
08	04/15/1997	CTB	B 17	VOCAB	NP	0000	PROB/SLV	SS	0788	PROB/SLV	NP	0070
05	04/22/1994	CTB	B 15	COMPREHE	SS	0708	COMPREHE	NP	0032	PROB/SLV	SS	0667
				PROB/SLV	NP	0010	LANGUAGE	SS	0694	LANGUAGE	NP	0026
				CAP/MECH	SS	0646	CAP/MECH	NP	0008	USAGE/EX	SS	0742
05	04/22/1994	CTB	B 15	USAGE/EX	NP	0061						
04	03/29/1993	CTB	A 14	READ(T)	SS	0711	READ(T)	NP	0059	MATH(T)	SS	0668
				MATH(T)	NP	0022	COMPREHE	SS	0735	COMPREHE	NP	0074
				COMPUTAT	SS	0667	COMPUTAT	NP	0021	VOCAB	SS	0686
04	03/29/1993	CTB	A 14	VOCAB	NP	0043	PROB/SLV	SS	0669	PROB/SLV	NP	0024
				SCIENCE	SS	0707	SCIENCE	NP	0049	SS/ENVIR	SS	0692
				SS/ENVIR	NP	0034						
04	02/10/1993	WAP	04	WR NARRA	SS	0000	WR EXPOS	SS	0000	WRITING	SS	0000
03	04/08/1992	CTB	A 13	COMPREHE	SS	0733	COMPREHE	NP	0085	PROB/SLV	SS	0649
				PROB/SLV	NP	0026	LANGUAGE	SS	0696	LANGUAGE	NP	0050
				CAP/MECH	SS	0679	CAP/MECH	NP	0044	USAGE/EX	SS	0712
03	04/08/1992	CTB	A 13	USAGE/EX	NP	0056						
02	04/16/1991	CTB	A 12	READ(T)	SS	0663	READ(T)	NP	0060	MATH(T)	SS	0467
				MATH(T)	NP	0001	COMPREHE	SS	0659	COMPREHE	NP	0051
				COMPUTAT	SS	0337	COMPUTAT	NP	0001	VOCAB	SS	0667
02	04/16/1991	CTB	A 12	VOCAB	NP	0070	PROB/SLV	SS	0597	PROB/SLV	NP	0025

*********************************** END OF TRANSCRIPT ***********************************

EXHIBIT P

1
2 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
3
CASE: 15-cv-07433-RWS
4
VIRGINIA GIUFFRE,
5
Plaintiff,
6
v.
7
GHISLAINE MAXWELL,
8
Defendant.
9 ____________________/
10
VIDEOTAPED DEPOSITION OF TONY FIGUEROA
11
Volume 1 of 2
12
Pages 1 - 157
13
14
15 Taken at the Instance of the Defendant
16
17
DATE: Friday, June 24, 2016
18
TIME: Commenced: 8:59 a.m.
19 Concluded: 1:22 p.m.
20 PLACE: Southern Reporting Company
B. Paul Katz Professional Center
21 (SunTrust Building)
One Florida Park Drive South
22 Suite 214
Palm Coast, Florida 32137
23
REPORTED BY: LEANNE W. FITZGERALD, FPR
24 Florida Professional Reporter
Court Reporter and Notary Public
25

1 APPEARANCE OF COUNSEL

2

3

4 ON BEHALF OF THE PLAINTIFF:

5 BRADLEY J. EDWARDS, Esquire
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
6 425 North Andrews Avenue
Ft. Lauderdale, Florida 33301
7 954-524-2820
Brad@pathtojustice.com
8

9

10 ON BEHALF OF THE DEFENDANT:

11 LAURA A. MENNINGER, Esquire
Haddon, Morgan and Foreman, P.C.
12 150 East 10th Avenue
Denver, Colorado 80203
13 303-831-7364
Lmenninger@hmflaw.com; Nsimmons@hmflaw.com
14

15

16 Also appearing: Jenny Martin, Videographer from Abel
Virginia Giuffre, Plaintiff
17

18

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1 INDEX

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20 STIPULATION

21 It is hereby stipulated and agreed by and

22 between counsel present at this deposition and by

23 the deponent that the witness review of this

24 deposition would be waived.

25

1 INDEX OF EXHIBITS

2

3 (MARKED BY THE DEFENDANT:)

14

15

16 - - -

17

18 (MARKED BY THE PLAINTIFF:)

22

23 - - -

24

25

1 BY MS. MENNINGER:
2 Q And where did you go after Royal Palm
3 Beach?
4 A I believe it was South Area. I'm pretty
5 sure it was South Area.
6 Q Did you go to another school after that?
7 A Yeah. I went to Gold Coast after that.
8 Q Is that also in Royal Palm Beach?
9 A No. That's -- South Area was in Lake
10 Worth. Gold Coast is in West Palm. They were both
11 alternative schools.
12 Q Did you ever go to a Survivors Charter
13 School?
14 A Yes. I went there, too.
15 Q When did you go there?
16 A I'm not exactly sure of the date. But it
17 was somewhere after either -- I'm pretty sure it
18 was -- maybe -- I can't remember if it was Gold
19 Coast first or Survivor. But one of the -- I'm
20 trying to remember. I honestly don't remember which
21 one came first.
22 Q That's all right.
23 Can you describe for me Survivors Charter
24 School? What is it like, or was it like?
25 A I mean, like I said, it was an alternative

1 school. It was just pretty much a bunch of bad
2 kids, you know, who have gotten kicked out. And it
3 was pretty much like a last chance kind of school,
4 you know what I mean?
5 Q Does it look like a school?
6 A Kind of. I mean, it had, like, a
7 cafeteria, and then it had a whole bunch of, like,
8 portables and stuff around there. And it was
9 under -- it was, like, right near the Lake Worth. I
10 remember there was, like, a bridge that went over
11 the interstate right by it. But, I mean, it was
12 just a little, you know, little crappy school.
13 Q Was it during the day or at night?
14 A It was during the day.
15 Q So regular school hours?
16 A Yeah. Well, it was actually a little bit
17 shorter hours. I can't remember exactly. But I
18 know it was not like the full days. Because, I
19 mean, at the alternative schools, it's obviously not
20 up to regular high school standards. I mean, they
21 just do pretty much stuff to get people to get out
22 of school, you know, so...
23 Q Get the credits that you need?
24 A Yeah. So that way they can finish high
25 school and not drop out and whatnot, so...

1 Q You actually go there in the morning,
2 though, and take classes?
3 A Yeah.
4 Q And get checked in at attendance?
5 A Yeah.
6 Q And then you may leave a little earlier
7 than a regular school day?
8 A Uh-huh (affirmative).
9 Q All right. It's not a online program?
10 A No, it was not online.
11 Q When you were at Survivors Charter School,
12 did you ever see Ms. Roberts there?
13 A Was it Survivors? I don't remember if it
14 was Survivors. Or was it -- because I'm pretty sure
15 we were both -- was it -- I know we both went to one
16 of the schools. I'm pretty sure it was Survivors,
17 maybe.
18 Q Did you see her there?
19 A Now, when we went to the school, like, we
20 were together afterwards. But I don't remember
21 exactly which one it was. I know it was one of
22 those alternative schools that we went to, though.
23 Q Okay. Did you -- was Wellington an
24 alternative school?
25 A No. Wellington is a -- is a real high

1 school, like a regular high school.
2 Q Do you know if Wellington has an adult
3 program?
4 A They might. I mean, I really don't know.
5 I'm not sure.
6 Q Did you ever take night classes there?
7 A No.
8 Q So you believe when you reunited with
9 Ms. Roberts in or around 2001, she had also gone to
10 one of those alternative schools?
11 A When I reunited with her, no. We ended
12 up, like, trying to go finish school.
13 Q Tell me about that.
14 A I mean, we just ended up going to one of
15 those alternative schools and didn't even finish
16 that.
17 Q So you two had both left school, but went
18 back together --
19 A Yeah.
20 Q -- to one of the alternative schools?
21 A Yeah.
22 Q And that may have been Survivors Charter
23 School?
24 A Yeah. I'm pretty sure it probably was.
25 I'm pretty sure.

1 Q You both wanted to get your GEDs?
2 A Yeah.
3 Q Get better jobs?
4 A Uh-huh (affirmative).
5 Q Things like -- that was the plan?
6 A Yeah.
7 Q But it did not work out?
8 A Yeah.
9 Q Do you know how long the two of you went
10 to Survivors Charter School?
11 A I honestly don't remember.
12 Q Okay. You do have a recollection of going
13 with her, though?
14 A Yeah.
15 Q Seeing her there?
16 A Uh-huh (affirmative).
17 Q I'm trying to get a little bit of a time
18 frame on the time that you reunited with
19 Ms. Roberts. I know you said you lived -- you
20 remember being in an apartment with her in September
21 of 2000 -- 9/11/2001; right?
22 A Yeah.
23 Q Do you think you had been together with
24 her for a while at that point?
25 A It was probably, I'd say, like a month or

1 so. Like, I'm pretty sure. Because it was not too
2 long after I had moved in, so...
3 Q And just to be clear, she already lived in
4 the apartment?
5 A Yeah. She lived in the apartment with her
6 ex-boyfriend Michael and JJ. And I think there was
7 somebody else. I don't remember who, though.
8 Q All right. That's where she was living
9 when you reunited with her?
10 A Yeah.
11 Q And then you moved in?
12 A Yeah.
13 Q Did the other people move out?
14 A Yeah. I kicked them out.
15 Q How long did you live there with
16 Ms. Roberts?
17 A I think it was just till, like, the end of
18 the lease, so it was probably maybe, like, five or
19 six months. I'm pretty sure. I don't know. I'm
20 not exactly [sic] on the whole time frame.
21 Q That's okay. I understand it was a while
22 ago.
23 A Yeah.
24 Q Where did you two move from there?
25 A I believe we either -- we went to her --

1 it was either her family's house or mine. It was
2 either one of the two. And then we ended up getting
3 another -- we were renting a house out in
4 Loxahatchee also, eventually. But we also stayed in
5 a little trailer behind her parents' house.
6 Q When did your relationship with
7 Ms. Roberts end the second time?
8 A When she went to Thailand and --
9 (Brief interruption.)
10 A -- never heard from her again.
11 THE COURT REPORTER: I'm sorry. Can you
12 re-answer?
13 A Yeah. When Jeffry sent her to Thailand.
14 And then I never heard from her again until
15 freaking, like, two days ago.
16 BY MS. MENNINGER:
17 Q You heard from her two days ago?
18 A Yeah. She had called me to apologize
19 about, obviously, everything about me getting
20 dragged into this mess. And we talked just pretty
21 much about, you know, the way shit ended, and pretty
22 much tried just -- her apologizing mainly about
23 dragging me all into this and having to make me
24 get -- you know, knowing how I have my family and
25 stuff now. And that was pretty much it, so...

1 Q Another instant connection.
2 A Uh-huh (affirmative).
3 Q From the time Ms. Roberts left to go to
4 Thailand until today, have you seen her?
5 A Nope.
6 And to be honest, it still does not even
7 feel real that she's sitting right there across from
8 me.
9 Q Well, you offered to get in touch with her
10 a couple of times?
11 A I know. But, like I said, it's just -- it
12 still does not seem like this is actually happening.
13 Like, she's -- I don't know. It's like talking to a
14 ghost or seeing one.
15 Q Does she look different now?
16 A Yeah.
17 Q How?
18 A Just more mature, more older.
19 Q When you were with Ms. Roberts the first
20 time in '98 --
21 A Uh-huh (affirmative).
22 Q -- you believe that relationship lasted
23 just a couple of weeks?
24 A Yeah. I'm not exactly sure, but it was
25 pretty brief.

1 A I believe so, yes.
2 Q What did she tell you about that?
3 A I -- I think that maybe he -- I mean, I
4 don't know exactly. I don't really remember. I
5 remember hearing about him, but I don't remember
6 what she said about him.
7 Q Did Ms. Roberts ever tell you that she had
8 met Al Gore?
9 A Not that I'm aware of.
10 Q Did Ms. Roberts ever tell you that she had
11 met a foreign president?
12 A I'm not sure; I'm not sure.
13 Q Did Ms. Roberts ever tell you she had met
14 a prime minister?
15 A I don't know.
16 Q Did Ms. Roberts ever tell she had met a
17 senator?
18 A Not that I'm aware of. I mean, she's told
19 me that she met a bunch of people before. And after
20 it started becoming, like, an almost everyday thing
21 about -- just hearing about famous people with
22 Jeffrey and stuff like that, it's, like, I kind of
23 didn't, like, tone it out, but I just -- it became
24 normal, so I just stopped, like, listening to all
25 the details, because I was not going to meet these

1 people, you know what I mean? It's just, like, all
2 right.
3 Q Was she excited that she was meeting
4 famous people?
5 A Yeah.
6 Q Was that a job perk?
7 A Obviously.
8 Q She talked about it a lot?
9 A Yeah.
10 Q To the point where you were drowning it
11 out?
12 A Well, that's what I'm saying. It was not
13 like I was drowning it out. It's just I knew that
14 she was with Jeffrey, and he was, obviously,
15 well-connected with everybody. So it was not like,
16 you know, a special occasion, per se. You know, it
17 was, but it's not like it was -- it was not very not
18 rare so...
19 Q Did she show you any photographs of
20 herself with famous people?
21 A No.
22 Q Did you see a photograph of her with
23 Prince Andrew --
24 A Yes.
25 Q -- in her possession?

1 BY MS. MENNINGER:
2 Q Mr. Figueroa, you mentioned that you and
3 Ms. Roberts attempted to go to back to school while
4 you were together --
5 A Yes.
6 Q -- to get your GED?
7 A Yeah. Yes.
8 Q And you believe that you went to the
9 Survivors Charter School?
10 A Yes.
11 MS. MENNINGER: Okay. I'm going to mark
12 Defendant's Exhibit 6.
13 (Defendant's Exhibit 6 was marked for
14 identification.)
15 BY MS. MENNINGER:
16 Q This is a school record for Ms. Roberts
17 that lists the names of various schools. And --
18 A So it was Survivors, obviously. That's
19 the only one on that list that isn't -- or that's
20 there that's on mine, as well.
21 Q Okay.
22 A Other than the other ones, but...
23 Q All right. So you recognize Survivors
24 Charter School on Ms. Roberts' school records?
25 A Yeah. That's what I'm saying. Since that

1 is the one on here, that's -- that's completely
2 clear. I could not remember if it was that one or
3 Gold Coast.
4 Q Okay. There is an entry date for
5 Ms. Roberts at Survivors Charter School of
6 10/12/2001, and a withdrawal on 3/7 of '02. Do you
7 see that?
8 A I mean, it's this; right? I mean, that's
9 the top.
10 Q The entry date of 10/12/01, withdrawal
11 3/7/02 at Survivors?
12 A Okay. I did not know what those
13 numbers -- I did not realize that that was a date.
14 Q I understand. And I know you did not make
15 this record.
16 So I'm just wanting to know if that's
17 consistent with your recollection, that you guys
18 went to school in the fall of 2001 until the --
19 A Yeah, that sounds about right.
20 Q -- March of 2002. It sounds right?
21 A Yeah.
22 Q And you both went to school together?
23 A Uh-huh (affirmative).
24 Q In the mornings?
25 A Yeah.

1 Q And got out of school at some earlier time
2 than a regular school day?
3 A Yeah.
4 Q Do you recall Ms. Roberts going to Royal
5 Palm Beach High? Again, this is in the 2001 time
6 frame.
7 A I -- I don't recall. I really don't.
8 Q Do you recall her, during the time you
9 were with her, taking any night classes at
10 Wellington High School?
11 A I don't recall.
12 Q Is it possible?
13 A It's a possibility.
14 MR. EDWARDS: Object to the form.
15 BY MS. MENNINGER:
16 Q Do you know whether Wellington has a night
17 school program?
18 A Like I said before, I don't know. They
19 could.
20 Q You went there in ninth grade?
21 A Yeah. It was during the day, though. I
22 have no clue about night school.
23 Q Got it.
24 But you do have a memory about Survivors
25 Charter School?

1 CERTIFICATE OF OATH

2

3 STATE OF FLORIDA)
)
4 COUNTY OF FLAGLER)

5

6

7 I, the undersigned authority, certify that TONY

8 FIGUEROA personally appeared before me on

9 June 24, 2016, and was duly sworn.

10

11 WITNESS my hand and official seal this 5th day

12 of July, 2016.

13

14

15

16

17



18

19 ______________________________

20 Leanne W. Fitzgerald
Notary Public - State of Florida
My Commission No. FF060921
21 Expires: February 8, 2018

22 Digital Certificate Authenticated
By Symantec

23

24

25

CERTIFICATE OF REPORTER

STATE OF FLORIDA)
)
COUNTY OF VOLUSIA)

I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a true record of my stenographic notes.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 5th day of July, 2016.

Leanne W. Fitzgerald, FPR
Florida Professional Reporter

Digital Certificate Authenticated
By Symantec

EXHIBIT Q

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq.
401 East Las Olas Boulevard
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Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.
By Laura Menninger, Esq.
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150 East 10th Avenue
4 Denver, CO 80203
Phone: 303.831.7364
5 lmenninger@hmflaw.com
jpagliuca@hmflaw.com
6 Appearing on behalf of the
Defendant
7
Also Present:
8 Ann Lundberg, Paralegal
Maryvonne Tompkins, Videographer
9

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1 Pursuant to Notice and the Federal Rules
2 of Civil Procedure, the continued video
3 deposition of VIRGINIA GIUFFRE, called by Defendant,
4 was taken on Monday, November 14, 2016, commencing at
5 8:04 a.m., at 150 East 10th Avenue, Denver, Colorado,
6 before Pamela J. Hansen, Registered Professional
7 Reporter, Certified Realtime Reporter and Notary
8 Public within Colorado.
9
* * * * * * *
10 I N D E X
11 VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II
12 EXAMINATION PAGE

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INDEX OF EXHIBITS (continued)

DESCRIPTION		INITIAL REFERENCE
Exhibit 15	Patient Health Summary, Clifton Beach Medical & Surgical, printed on 6/28/2016	512
Exhibit 16	Portions of deposition transcript of Virginia Giuffre taken May 3, 2016	533
Exhibit 17	Amendment/Errata Sheet signed May 31, 2016 by Virginia Giuffre	540
Exhibit 18	Ad for Mar-a-Lago Club	548
Exhibit 19	The Mar-a-Lago Club, L.C. Employment Policies, October 28, 1995	549
Exhibit 20	Page from the Mar-a-Lago Club Employment Policies, Revised 10/2001	550

1 A Yes.

2 Q And you believe the Neiman Marcus was

3 located in which city?

4 A Well, it's around Fort Lauderdale. I

5 can't tell you exactly. Fort Lauderdale is so big,

6 like Broward County? Is that the word for it?

7 Q And what did you do at Neiman Marcus?

8 A I worked in the changing rooms.

9 Q And what did you do in the changing room?

10 A I think I just like -- if I remember

11 right, I just put clothes away that people left in

12 there. Probably went out to get sizes, different

13 sizes for women who wanted different sizes of the

14 same product.

15 Q And where did you work after Neiman

16 Marcus?

17 A Taco Bell.

18 Q Did you work at Southeast Employee

19 Management Company?

20 A I don't recognize that. I don't know if

21 that's a payroll company or what it is. I don't know

22 what Southeast -- what is it called?

23 Q Southeast Employee Management Company.

24 A No, I don't remember that.

25 Q Did you ever work as a temp?

1 A Not that I remember.
2 Q Going to different offices and filling in?
3 A No.
4 Q Did you work for Oasis Outsourcing?
5 A I don't -- I don't know if that's a
6 payroll company or if that's an actual place, but
7 that doesn't ring a bell.
8 Q Did you -- do you know how much you got
9 paid when you were working at places like Oasis
10 Outsourcing?
11 A Well, considering I don't know if I worked
12 at Oasis Outsourcing, I wouldn't even know how much I
13 got paid.
14 Q Did you review your Social Security
15 records?
16 A Yes.
17 Q You saw Oasis Outsourcing listed there?
18 A Right, but like I said, it doesn't even
19 ding a bell at all.
20 Q Do you know how much money they said you
21 made from them?
22 MS. MCCAWLEY: Objection. If you want to
23 show her the documents, she can see what amount is
24 listed and answer your questions, but if you're not
25 going to show her the document, that's the best she

1 don't know where I was living.
2 Q Okay. Did you indicate whether you had
3 gone to school?
4 A Yes, I did.
5 Q What did you indicate?
6 A I indicated that I attended Survivors
7 Charter School for four years and had a high school
8 diploma.
9 Q And you graduated?
10 A Well, I didn't. I just wanted to get a
11 job, and I wanted it to look good, so I fluffed it
12 up.
13 Q So you wrote that down in your handwriting
14 on this application, correct?
15 A I did.
16 Q And it was not true, correct?
17 A Again, I'm not proud of it. I just didn't
18 have any other way of getting a job and I just
19 thought if I put that down there, I might be
20 considered.
21 Q You indicated when you were younger you
22 volunteered for six years at a riding clinic. What's
23 the name of the riding clinic?
24 A Vince Ramos. And I'm not too sure if it
25 was six years, but I started off there quite young,

1 a former employer is the Indigo Bar and Grill,
2 correct?
3 A Yes.
4 Q Is that true?
5 A No, it was not.
6 Q On the page before that, it indicates you
7 went to Royal Palm Beach High School. Is that in
8 your handwriting?
9 A Yes, it is.
10 Q And it says you went for four years and
11 you graduated?
12 A Yes.
13 Q In your handwriting?
14 A Yes.
15 Q Is that true?
16 A No.
17 Q This was an application you filled out in
18 January of 2014, correct?
19 A Correct.
20 Q The page before that is your -- portion of
21 your resume I think we have previously discussed, but
22 just confirming, you did send that resume to this job
23 application, correct?
24 A I did.
25 Q And you indicated you had worked at

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Pamela J. Hansen, do hereby certify that

5 I am a Registered Professional Reporter and Notary

6 Public within the State of Colorado; that previous to

7 the commencement of the examination, the deponent was

8 duly sworn to testify to the truth.

9 I further certify that this deposition was

10 taken in shorthand by me at the time and place herein

11 set forth, that it was thereafter reduced to

12 typewritten form, and that the foregoing constitutes

13 a true and correct transcript.

14 I further certify that I am not related to,

15 employed by, nor of counsel for any of the parties or

16 attorneys herein, nor otherwise interested in the

17 result of the within action.

18 In witness whereof, I have affixed my

19 signature this 23rd day of November, 2016.

20 My commission expires September 3, 2018.

21

22 _______________________________

Pamela J. Hansen, CRR, RPR, RMR

23 216 - 16th Street, Suite 600

Denver, Colorado 80202

24

25

EXHIBIT R

SSA-1826

ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

Date: 10/25/2016

BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301-2211

We are sending the statement of earnings requested for:

Number Holder's Name: VIRGINIA GIUFFRE
Social Security Number: [redacted]

Years Requested: 1998 THRU 2002; 2013 THRU 2015

Control Number: 16294125319
Remittance Number: 201610240012

Enclosure(s):
Earnings Statement

SSA-1826 ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website.
http://www.ssa.gov/OACT/COLA/cbb.html

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website.
http://www.ssa.gov/OACT/COLA/cbb.html

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

SSA-1826 ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

FROM: SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE
YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301

*0302Q7P7V000026*NOTAFP.X3.FMI1826.AFP.R161024.PAM 000000000 002601063569621865313390122100

EMPLOYER NUMBER: [REDACTED]
KFC USA INC
% PAYROLL DEPT
5200 COMMERCE CROSSING DR
LOUISVILLE KY 40229-2182

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					$140.70

EMPLOYER NUMBER: [REDACTED]
PUBLIX SUPER MARKETS INC
PO BOX 32018
LAKELAND FL 33802-2018

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					$216.69

EMPLOYER NUMBER: [REDACTED]
ASCENSION CHILD CARE CENTER
ASCENSION PEACE CHILD CARE CENTER
2701 N STATE ROAD 7
LAUD LAKES FL 33313-2731

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					$216.97

SSA-1826 ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
AVICULTURAL BREEDING & RESEARCH
CENTER
% ERNEST LAKS
14201 125TH AVE N
WEST PALM BCH FL 33418-7945

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$99.48

EMPLOYER NUMBER: [REDACTED]
SOUTHEAST EMPLOYEE MANAGEMENT
COMPANY
2559 PALM DEER DR
LOXAHATCHEE FL 33470-2563

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$3,212.44

EMPLOYER NUMBER: [REDACTED]
MAR-A-LAGO CLUB LLC
TRUMP DONALD J GEN PTR
% TRUMP ORGANIZATION
1100 S OCEAN BLVD
PALM BEACH FL 33480-5004

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$1,866.50

EMPLOYER NUMBER: [REDACTED]
OASIS OUTSOURCING VI INC
2054 VISTA PKWY STE 300
WEST PALM BCH FL 33411-6742

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$2,037.60

EMPLOYER NUMBER: [REDACTED]
NEIMAN-MARCUS GROUP LLC
% NEIMAN MARCUS GROUP LTD SOLE MBR
1201 ELM ST
DALLAS TX 75270-2102

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$1,440.79

SSA-1826 ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
MANNINOS INC
MANNINOS RESTAURANT
12793 B W FOREST HILL BLVD
WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					$212.00

EMPLOYER NUMBER: [REDACTED]
CCI OF ROYAL PALM INC
% ROBERT FURR TTEE
2255 GLADES RD STE 337-W
BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$403.64

EMPLOYER NUMBER: [REDACTED]
ROADHOUSE GRILL INC
ROBERT C FURR TTEE IN BANKRUPTCY
2255 GLADES RD STE 337W
BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$1,247.90

EMPLOYER NUMBER: [REDACTED]
MARC PINKWASSER DVM PA
13860 WELLINGTON TRCE STE 31
WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$1,561.75

EMPLOYER NUMBER: [REDACTED]
GREAT OUTDOORS PREMIER RV-GOLF
RESORT COMMUNITY SVC ASSOC INC
145 PLANTATION DR
TITUSVILLE FL 32780-2528

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2014					$171.83

SSA-1826 ITEMIZED STATEMENT OF EARNINGS

* * * FOR SSN [redacted] * * *

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*********************************************************************
*********  THERE ARE NO OTHER EARNINGS RECORDED UNDER THIS  *********
*********  SOCIAL SECURITY NUMBER FOR YEAR(S) REQUESTED     *********
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EXHIBIT S

January 30, 2003

To Whom It May Concern,

Skye Roberts has been a most valuable employee at The Mar-a-Lago Club since April of 2000. While employed as a maintenance crew team member, he has been responsible for maintaining the five championship red-clay tennis courts as well as keeping all of the individual air conditioning units working and in tip-top shape.

It is my understanding that Skye is relocating to Colorado. Should he ever return to Florida, he would be eligible for re-hire.

Sincerely,

Donald J. Trump

The Mar-a-Lago Club, L.C.
PALM BEACH, FLORIDA
1100 South Ocean Boulevard, Palm Beach, Florida 33480 (407) 832-2600 Fax (407) 832-2669

TERMINATIONS

LAST NAME	FIRST NAME	
Abbott	Philip	Box #1
Acevedo	Michael	Box #4
Adams	Zane	Box #3
Adams	Cynthia	Box #1
Adams	Patrick	Box #1
Addison	Andrea	Box #4
Adelfio	Peter	Box #4
Adler	Jessica	Box #1
Aldahondo	Francisco	Box #6
Alexis	Genicia	Box #3
Allen	Suzanne	Box #1
Almeida	Tiberio	Box #4
Almgren	Shane	Box #3
Alves	Victor	Box #4
Anaya	Orlando	Box #4
Anderson	Sandra	Box #6
Andres-Felix	Francisco	Box #4
Annunziata	Susan	Box #3
Anton	Frank	Box #1
Aquino	Jorge	Box #4
Argueta	Irma	Box #3
Armstrong	April	Box #4
Ash	Carol	Box #6
Ashenbrenner	William	Box #3
Auguste	Firenze	Box #6
Bacon	John	Box #4
Bader	Susan	Box #1
Bader	Erwin	Box #1
Baghouli	Adel	Box #6
Bahena	Lucio	Box #6
Baker	Teresa	Box #3
Balkunas	Vicki	Box #6
Banks	Michael	Box #4
Baranek	Katherine	Box #3
Baron	Todd	Box #6
Barr	James	Box #4
Barr	Gail	Box #1
Barrett	Loraine	Box #3
Barrill	London	Box #3
Beam	Stephen	Box #6
Beaudoin	Louis	Box #1
Beckett	Sam	Box #3
Benarroch	Alice	Box #1
Bend	John	Box #1
Benitez	Sixta	Box #3
Bennett	Thomas	Box #3
Benney	Tabitha	Box #3
Benoit	Mark	Box #1
Bernal	Ana	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Bernhardt	Gretchen	Box #1
Berube	Michael	Box #4
Beswick	Allan	Box #6
Beverly	Tim	Box #4
Bezwiechin	Cham	Box #3
Blake	Howard	Box #3
Bloch	Michael	Box #3
Blyth	Alison	Box #6
Bobrowski	Michele	Box #3
Bocksch	Kristy	Box #4
Boehm	Erica	Box #3
Boettcher	Joe	Box #6
Bogert	Debra	Box #3
Boisvert	Cory	Box #1
Bonilla	Jose	Box #4
Bork	Allen	Box #4
Borrego	Sandra	Box #4
Borrell	Salvator	Box #1
Borrelli	Lisa	Box #6
Boudreau	Matthew	Box #4
Boukhalfa	Said	Box #6
Bouschet	Courtney	Box #4
Brass	Baysson	Box #1
Brassler	Chris	Box #1
Brendel	Kendra	Box #6
Brennan	Mary	Box #1
Briante	Gerard	Box #1
Bridger	Jody	Box #3
Briggs	Jacqueline	Box #1
Brown	Eleanor	Box #6
Brown	William	Box #6
Brummel	Denis	Box #3
Bryan	Amy	Box #1
Bryant	William	Box #4
Buckingham	Annette	Box #1
Buckley	Cynthia	Box #4
Budziak	Diane	Box #1
Burdett	Jill	Box #6
Burgess	Lawrence	Box #3
Burgon	Helya	Box #6
Burke	Maureen	Box #4
Burke	Christopher	Box #4
Burlew	Gary	Box #1
Burton	Myles	Box #3
Butler	Michael	Box #4
Calder	Malgorzata	Box #3
Caldwell	Karen	Box #1
Camacho	Darren	Box #4
Camilleri	Mark	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
Campbell	Benjamin	Box #3
Candella	Charles	Box #4
Cantrell	Dantelle	Box #4
Capozzi	Christina	Box #4
Carlisle	Kevin	Box #1
Carr	Janet	Box #3
Carroll	VALerie	Box #4
Carvalho	Deo	Box #3
Casher	Jeremy	Box #1
Castano	Ku	Box #4
Castillo	Sandra	Box #6
Castro	Juan	Box #4
Catranbone	Angela	Box #1
Cavinee	Krystal	Box #4
Celestin	Jean	Box #3
Chambers	Craig	Box #1
Chapuis	Rene	Box #1
Charles	Fresnel	Box #6
Charles	Sylfida	Box #6
Chillingsworth	Vanette	Box #6
Chioffe	James	Box #1
Christie	Michael	Box #4
Ciaffone	Cora	Box #6
Ciccia	John	Box #3
Clark	Kimberly	Box #1
Cleveland	Trisha	Box #6
Cloninger	Tana	Box #3
Coffman	Connie	Box #4
Cohen	Julius	Box #6
Cole	Joanne	Box #1
Collins	Yvette	Box #1
Collins	Barbara	Box #1
Conroy	James	Box #4
Cordero	Vera	Box #1
Cordero	Vero	Box #1
Cortes	Roberto	Box #3
Corti	Debra	Box #3
Coutts	Rachael	Box #1
Cox	Emory	Box #1
Cronin	Sonia	Box #6
Cross	Deborah	Box #6
Crostic	Barbara	Box #4
Crowley	Tricia	Box #6
Cruz	Lonjino	Box #6
Cruz	Israel	Box #6
Crystle	Joshua	Box #4
Cuervo	Anamaria	Box #4
Cummings	Meghan	Box #6
Curran	Maureen	Box #1

TERMINATIONS

LAST NAME	FIRST NAME	
Czerniak	Anthony	Box #4
Daley	Chad	Box #6
Damiano	Anthony	Box #4
Davis	Jeremy	Box #4
Davis	Eric	Box #1
Deak	Stephen	Box #6
Dean	Laurie	Box #6
Deleon	Elais	Box #4
Delia	Frank	Box #4
Dellay	Scott	Box #1
DeLorenzo	Mark	Box #6
DeNarvaez	Claudia	Box #3
DePaula	Danielle	Box #4
DeRiso	Gina	Box #1
DeSernia	Sulamita	Box #3
Devine	Keith	Box #1
DeVito	Dawn	Box #1
DiBenedetto	Melissa	Box #3
Dickens	George	Box #6
Dieu Donne	Jean Charles	Box #4
Dimitrova	Violeta	Box #3
Dodge	Virginia	Box #1
Dombayci	Yimaz	Box #6
Domnick	Mark	Box #1
Donnelly	Jennie	Box #3
Dorsa	Antonio	Box #1
Drake	Charlie	Box #6
Drogowski	David	Box #6
Dubois	Lydia	Box #4
Dubois	Crystal	Box #6
Dumstra	Adam	Box #6
Eaton	Adam	Box #4
Edge	Jerod	Box #4
Edwards	Don	Box #4
Egger	Paul	Box #6
Elkhoury	Toni	Box #6
Ellingworth	David	Box #6
Ellis	Christine	Box #1
Elwell	Douglas	Box #1
Enger	Mark	Box #3
English	Mistie	Box #3
Espinoza	Francisca	Box #4
Espinoza	Henner	Box #3
Espinoza	Carlos	Box #6
Estime	Karl	Box #1
Ettehad	Shahla	Box #4
Faaland	Roy	Box #1
Faba	Juan	Box #1
Fagen	Lanell	Box #1

TERMINATIONS

LAST NAME	FIRST NAME	
Faraci	Franklin	Box #1
Fasel	Jeremy	Box #4
Faulk	Joel	Box #1
Feal	Jose	Box #4
Feick	Gretchen	Box #4
Fein	Lawrence	Box #1
Fernandez	Jose	Box #6
Ferree	Tonya	Box #3
Fesser	Michael	Box #1
Fidanovic	Novak	Box #6
Figueroa	Irina	Box #3
Filippone	Vittorio	Box #4
Finch	Michael	Box #1
Finckenor	George	Box #4
Fink	Roger	Box #4
Fiorentino	Maria	Box #4
Firat	Turabi	Box #1
Fischbach	Nora	Box #3
Fischer	Rosemary	Box #4
Fiumara	Michele	Box #3
Flores	Pedro	Box #3
Folmer	Ronald	Box #1
Foss	John	Box #1
Fox	Lisa	Box #6
Francoeur	Mary Lou	Box #6
Fratus	Donna	Box #3
Frelich	Jason	Box #6
Frey	Kenneth	Box #4
Friday	Jennifer	Box #6
Frith	Cynthia	Box #1
Fritz	John	Box #1
Frost	Mark	Box #1
Gacon	Allan	Box #1
Galla	Galla	Box #1
Galloway	Kurt	Box #6
Galloza	Sergio	Box #3
Garcia	Souad	Box #6
Garcia-Douglas	Marcia	Box #6
Garrido	Dante	Box #4
Gedeum	Rosalie	Box #3
Gell	William	Box #3
Gervais	Marie	Box #6
Getgood	Russell	Box #1
Gibeault	Larry	Box #1
Gillie	Barbara	Box #1
Gividen	Nathan	Box #1
Glass	Kevin	Box #1
Goicochea	Darcy	Box #6
Goldrich	Amanda	Box #3

TERMINATIONS

LAST NAME	FIRST NAME	
Golemis	Sam	Box #3
Gomaa	Ashraff	Box #6
Gonzales	Augustine	Box #4
Gonzales	Dora	Box #4
Gonzalez	Raul	Box #3
Gonzalez	David	Box #1
Gonzalez	Elsa	Box #1
Gonzalez	Alex	Box #6
Goodman	William	Box #4
Goupy	Bernad	Box #6
Gowdy	Charles	Box #1
Granjales	Myriam	Box #6
Grant	Everton	Box #4
Grasso	William	Box #3
Graves	Erika	Box #4
Green	Michelle	Box #1
Greene	James	Box #1
Greenwood	Elizabeth	Box #1
Gregson	Scott	Box #3
Grieve	Daniel	Box #3
Griffin	Mark	Box #1
Griffin	Michael	Box #1
Griffiths	Sandra	Box #1
Griggs	Dora	Box #3
Grosso	Peter	Box #1
Guerin	Jean	Box #1
Gutierez	Mauricio	Box #1
Gutierez	Porfidio	Box #1
Gutierrez	Antonio	Box #3
Guyierrez	Warren	Box #6
Hader	Karen	Box #3
Hagen	Kyla	Box #1
Haggar	Karen	Box #3
Hamby	Michael	Box #1
Harris	Dan	Box #6
Hartsough	Cheryl	Box #1
Hatch	Wendy	Box #1
Hatfield	Michael	Box #1
Havican	Robert	Box #6
Heanssler	Pete	Box #3
Hefel	Eric	Box #6
Hemings	Romy	Box #6
Hennessee	Jason	Box #3
Hernandez	Gladys	Box #3
Hernandez	Alexander	Box #3
Hernandez	Luis	Box #3
Herrara	Julio	Box #4
Herth	Francesca	Box #3
Higgins	Jennifer	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
Higgs	Kathleen	Box #1
Hill	Donna	Box #4
Hill	Samuel	Box #1
Hinkin	Cynthia	Box #3
Ho	Stella	Box #1
Hochong	Anthony	Box #6
Hodes	Robin	Box #4
Holcomb	Mary	Box #3
Holryid	Mary	Box #1
Homenuik	Wilfred	Box #6
Hong	David	Box #6
Hopkins	Victoria	Box #6
Horsky	George	Box #3
Hossain	Mohammed	Box #1
Hoyle	Patricia	Box #4
Huber	Frank	Box #4
Huguet	Roberto	Box #3
Hulsey	Thomas	Box #4
Hutchins	Marguerite	Box #4
Hyde	Rose	Box #6
Hylton	Longsworth	Box #6
Ibrahim	Ashraf	Box #4
Infante	Carlos	Box #4
Insani	Mark	Box #3
Ioli	Gina	Box #4
Irvine	Marche	Box #3
Jacob	Maureen	Box #1
Jacobs	Rick	Box #1
Jacques	Dudley	Box #1
Jacques	Nixon	Box #6
Jaferali	Errol	Box #4
James	Buddy	Box #6
Jankowski	Keith	Box #1
Jaramillo	Olmes	Box #1
Jean	Jacques	Box #6
Jenkins	Todd	Box #4
Jesperson	Henrik	Box #3
Johnansen	Elise	Box #6
Johnson	Eric	Box #4
Johnson	Josh	Box #4
Johnson	Chad	Box #1
Johnson	Debbie	Box #1
Johnson	Laura	Box #1
Johnson	Jade	Box #1
Johnson	Walter	Box #1
Johnson	Cathiejo	Box #6
Jones	Steve	Box #4
Jones	Regina	Box #3
Joseph	Elisca	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Juan	Miguel Tomas	Box #4
Juan	Angelina	Box #6
Kaiser	Stephen	Box #4
Kalson	Vince	Box #1
Kapreilian	Peter	Box #4
Karius	Michael	Box #4
Kaufman	Robert	Box #1
Keady	Mike	Box #1
Keiser	Lisa	Box #4
Keller	Mikchael	Box #4
Kelley	Nancy	Box #1
Kelly	Lois	Box #4
Kelly	John	Box #1
Kennedy	Sean	Box #3
Kenney	Marlou	Box #3
Kenny	Brian	Box #4
Kent	Scott	Box #4
Kincl	Joseph	Box #4
King	Helen	Box #4
King	Jeffrey	Box #3
King	Michael	Box #6
Kirby	Brian	Box #1
Kleinfeld	Robert	Box #1
Kline	Eileen	Box #6
Kole	Karen	Box #4
Kowalski	Susan	Box #1
Kresic	Blago	Box #1
Krogman	Terry	Box #1
Krpina-Zito	Marija	Box #4
Kruppenbacher	Michael	Box #6
Kuiper	Gary	Box #3
Kuntz	Carlson	Box #4
LaCerte	Troy	Box #1
Laidlaw	Kenneth	Box #3
Laine	Brent	Box #6
Laing	Melissa	Box #6
Lang	Eric	Box #4
Langford	Chad	Box #6
Langweiler	Albert	Box #1
Lanunziata	Stacia	Box #6
Laskaris	Alexandra	Box #1
Laufenberg	Lynette	Box #1
Lawlor	Thomas	Box #3
Lefrancois	Aaron	Box #3
Leite	Paulo	Box #1
Leitzell	jTara	Box #4
Leone	Nick	Box #1
Leonova	Victoria	Box #6
LeRoux	Marthinus	Box #6

TERMINATIONS

LAST NAME	FIRST NAME	
Lester	Carolina	Box #6
Lewis	Corey	Box #1
Leyden	Gene	Box #6
Liberte	Monney	Box #3
Lightbourne	Andrianne	Box #1
Lisec	Lisa	Box #1
Locke	Michelle	Box #3
Logalbo	Franklin	Box #6
Lopez	Claudio	Box #4
Lopez	Julian	Box #3
Lopez	Marvin	Box #3
Lopez	Mario	Box #6
Lopez	Roger	Box #6
Love	Rena	Box #3
Lowe	Karl	Box #3
Lugo	Christianne	Box #3
Lusse	Robert	Box #1
Luxton	Stephanie	Box #4
Lyle	Mary Jane	Box #6
Lynam	Robert	Box #6
Lynch	Cheri	Box #3
MacDonnell	Thomas	Box #7
Machado	Carlos	Box #4
Magerus	Georges	Box #4
Malay	Maya	Box #3
Maldonado	Juvencio	Box #1
Maldonaldo	James	Box #7
Mann	Andrew	Box #3
Mannion	Deidre	Box #4
Marcenaro	Eduardo	Box #1
Marchman	Henry	Box #4
Marino	Mindy	Box #1
Marrone	Kimberly	Box #3
Marshall	John	Box #7
Martinez	Steve	Box #1
Martinez	Zach	Box #7
Martinez	Hector	Box #7
Massias	Caroline	Box #4
Mateo	Alfredo Lucas	Box #1
Maurice	Marie	Box #3
Max	Susan	Box #1
Maxwell	Terence	Box #7
McAlees	Brook	Box #4
McBrayer	Cassandra	Box #1
McCabe	Kevin	Box #3
McCambridge	Angela	Box #1
McCann	Kevin	Box #3
McCarthy	Shannon	Box #3
McConnell	James	Box #4

TERMINATIONS

LAST NAME	FIRST NAME	
McCormick	Jennifer	Box #7
McDaniel	Elizabeth	Box #4
McDonald	Amanda	Box #3
McDonald	Deborah	Box #1
McFarland	Robert	Box #4
McGreevy	Barbara	Box #1
McKee	Wende	Box #4
McKeen	Nohora	Box #3
McKim	Mark	Box #1
McLean	Stephen	Box #4
McMahon	Leo	Box #7
McMiled	Patricia	Box #3
McNaughton	Sean	Box #7
McNicholas	Marie	Box #3
Mead	Paul	Box #7
Meade	Raymond	Box #1
Mena	Arturo	Box #1
Merchant	Kenneth	Box #4
Merriman	Rita	Box #7
Mesa	Uenoi	Box #3
Messemer	Brian	Box #4
Metayer	Edenes	Box #4
Metayer	Marie	Box #1
Michaels	Jesse	Box #7
Michel	Bernadette	Box #7
Miller	Eric	Box #3
Miller	Lisa	Box #3
Miller	Ronald	Box #7
Milosevic	Sas	Box #1
Miranda	Cari	Box #7
Mitchell	Edward	Box #4
Mohamed	Waleid	Box #4
Monaco	Lettia	Box #1
Monia	Gregory	Box #1
Monson	Jill	Box #7
Montano	Helmuth	Box #4
Montano	Henry	Box #4
Montecinos	James	Box #4
Moore	Joel	Box #2
Moran	Tom	Box #7
Moree	Darlene	Box #4
Moreno	Aura	Box #3
Morgan	Todd	Box #2
Morgan	Jennifer	Box #7
Morris	Katherine	Box #3
Morris	Rebecca	Box #7
Mosher	Neil	Box #2
Moss	William Coury	Box #4
Mullen	Sony	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Mullen	Cheryl	Box #7
Munford	Cheryl	Box #7
Munoz	Mariadelrocio	Box #4
Musallet	Hassan	Box #2
Musso	Diane	Box #7
Myers	Louisa	Box #3
Myers	Linda	Box #7
Nagy	Matthew	Box #4
Nagy	Viktoria	Box #7
Nakoneczny	Dawn	Box #4
Narleski	Linda	Box #2
Nasie	Waleed	Box #7
Natal	Luis	Box #3
Neira	Fernando	Box #3
Nelsen	Holly	Box #2
Nelson	Lisa	Box #3
Nemets	Tammie	Box #3
Nieporte	Joseph	Box #4
Noe	Thomas	Box #7
Noel	Marie	Box #7
Nolan	Susan	Box #2
Northern	Brad	Box #7
Noufal	Michel	Box #2
O'Boyle	Thomas	Box #7
Oconnor	Kevin	Box #2
Oesterling	Emily	Box #7
Oldfield	Janice	Box #2
Oliver	Meike	Box #4
O'Neill	Kathryn	Box #2
O'Neill	William	Box #2
O'Neill	Joseph	Box #7
Orozco	Clemente	Box #3
Pagen	Mitchel	Box #2
Pagliaro	Peter	Box #4
Palomba	Amanda	Box #2
Parker	Sandra	Box #3
Parker	Everett	Box #2
Parkinson	Nicole	Box #4
Pavelka	Nathan	Box #2
Pavonni	Michelle	Box #2
Pedro	David	Box #4
Peison	Brenda	Box #7
Pelaez	Juan	Box #2
Penate	Alexander	Box #4
Perez	Marlow	Box #4
Perkins	Tian	Box #4
Perrey	Arielle	Box #2
Pesasico	Crispin	Box #4
Petery	Pamela	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Petrillo	Camille	Box #3
Pharr	Stephanie	Box #4
Philips	Ralph	Box #3
Pickens	Robert	Box #2
Pientka	John	Box #2
Pierre-Noel	Yvonne	Box #4
Pinder	Patricia	Box #7
Pine	Jon	Box #3
Pino	Alex	Box #7
Pinto	Julie	Box #2
Piques	Christian	Box #7
Pisani	Craig	Box #2
Pisani	Nicholas	Box #2
Pitot	Patrick	Box #3
Pittinger	Mark	Box #4
Pitts	Jeremiah	Box #2
Plaine	Victoria	Box #3
Ponder	Janet	Box #3
Poston	Roberta	Box #4
Powell	Nicole	Box #3
Powell	Kelley	Box #7
Presto	Nicholas	Box #4
Price	Robin	Box #2
Prouty	Joy	Box #2
Prucien	Mona	Box #3
Quigley	Christy	Box #7
Quirao	Maria	Box #4
Rafrano	Dawn	Box #2
Ragland	Leslie	Box #2
Ramirez	Roxana	Box #2
Ramos	Milka	Box #3
Raphael-Dallas	Jamie	Box #3
Reardon	Lisa	Box #2
Reasinger	Amy	Box #2
Redmond	Suzanne	Box #2
Reed	Diana	Box #4
Reich	Gwendalyn	Box #2
Reil	Richard	Box #2
Reis	Brian	Box #7
Reis	Charles	Box #7
Reiser	Scott	Box #7
Rene	Josette	Box #4
Rene	Jean	Box #7
Rene	Lamercie	Box #7
Rennie	Kerry	Box #2
Reyes	Randolfo	Box #4
Reynolds	Janice	Box #7
Ribeiro	Gregg	Box #3
Richardson	Brian	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4
Roberts	Walter	Box #4
Roberts	Diane	Box #3
Robsham	Lydie	Box #7
Rodriguez	Francisco	Box #4
Rodriguez	Abel	Box #3
Rodriguez	Kenia	Box #3
Rodriguez	Aristalia	Box #2
Rogers	Howard	Box #2
Romeus	Melege	Box #2
Rony	Jean	Box #2
Roqueta	Maria	Box #2
Rose	Cheryl	Box #2
Rosenberg	Bradley	Box #2
Rosier	Sandra	Box #2
Rotchford	Bernadette	Box #4
Rubio	Pascual	Box #2
Rueda	Maria	Box #4
Ruiz	Juan	Box #2
Russeau	Heidi	Box #4
Russell	Kathryn	Box #4
Russotto	Vincent	Box #7
Ryan	Megan	Box #2
Ryan	Michael	Box #7
Saint Gerard	Manes	Box #7
Saint Surin	Jacquest	Box #2
Salloum	Adib	Box #2
Salman	David	Box #2
Salvador	Marian	Box #2
Sanford	Kevin	Box #5
Santos	Elimos	Box #2
Sasaki	Shoko	Box #7
Saunders	Sarah	Box #2
Savage	Angelia	Box #5
Savoie	Terry	Box #2
Scanlan	Peter	Box #5
Schlechter	Melissa	Box #5
Schmantowsky	Craig	Box #2
Schoonover	Richard	Box #2
Schroeder	Glenn	Box #5
Schumacher	Patricia	Box #2
Schwab	Emily	Box #2
Scotland	Jaycen	Box #7
Scott	Cecelia	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Seebauer	Gina	Box #7
Seesholtz	Joseph	Box #2
Sellas	William	Box #2
Serpico	Joseph	Box #2
Sevilla	Carlos	Box #5
Shaw	Tammy	Box #7
Shelhamer	Sage	Box #7
Shepherd	Michael	Box #7
Shields	Catherine	Box #2
Shumate	Regis	Box #5
Shumpis	David	Box #7
Similien	Raymond	Box #2
Simms	Amanda	Box #7
Simpson	Robert	Box #7
Sineni	Sandra	Box #2
Singerline	Thomas	Box #2
Skinner	Troy	Box #2
Sluzenski	Jonathan	Box #7
Smith	Jeremiah	Box #5
Smith	Ivan	Box #5
Smith	Meadow	Box #2
Smith	Debbie	Box #2
Smith	Elizabeth	Box #2
Smith	Fred	Box #2
Snyder	Lisa	Box #7
Soler	Luis	Box #2
Soliman	Alex	Box #2
Sosa	Anian	Box #7
Southall	Ginger	Box #2
Souza	Robert	Box #2
Spencer	Sxott	Box #2
Sprague	Steven	Box #2
Springer	Timothy	Box #2
Stanfield	Todd	Box #5
Staniszewski	Casey	Box #7
Stankunas	Jolanta	Box #7
Stanley	Lisa	Box #2
Sta-Rosa	Jaime Lindo	Box #2
Steinberg	Kathleen	Box #2
Steinhaus	Cynthia	Box #2
Steliga	Stephanie	Box #5
Stenger	Stuart	Box #2
Stephans	Dorian	Box #2
Stewart	Selvin	Box #2
Strohminger	Matthew	Box #2
Stuart	Susan	Box #2
Stuhr	Kenneth	Box #2
Sturtevant	Charles	Box #5
Sucur	Nicholas	Box #7

TERMINATIONS

LAST NAME	FIRST NAME	
Sullivan	Judith	Box #2
Sumpter	Drew	Box #2
Swan	Pyson	Box #5
Sweeney	Bridget	Box #5
Swiderski	Richard	Box #2
Swiderski	Mark	Box #2
Sylne	Romel	Box #2
Tan	Priscilia	Box #2
Tarantino	Vincenzo	Box #2
Tatum	Christopher	Box #7
Taylor	Kevin	Box #5
Tempfli	Glenn	Box #2
Thelemaque	{ierre	Box #5
Thibeault	William	Box #7
Thiel	Kurt	Box #2
Thiel	Ryan	Box #2
Thomas	Edward	Box #2
Thompson	Derek	Box #2
Thompson	Christine	Box #2
Tomer	Mary	Box #2
Tonge	Al	Box #5
Torres	Frank	Box #5
Torres	Iris	Box #7
Toussant	Elby	Box #7
Trevino	Danielle	Box #2
Tsitsirides	Alex	Box #5
Tucker	Marie	Box #7
Uljic	Gjon	Box #2
Umpierre	Frances	Box #7
Valdez	Bridges	Box #2
Valdez	Julie	Box #2
Valenti	Paul	Box #2
Vandersloot	Mildred	Box #5
VanVliet	Jane	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Vasquez	Sosmar	Box #5
Vasquez	Christian	Box #2
Vaughn	Matthew	Box #2
Velasquez	Rodollfo	Box #2
Vidalis	Chantal	Box #2
Voluck	Justin	Box #2
Vyskrebentsev	Aleksey	Box #5
Wahl	Steven	Box #5
Walker	Sylvia	Box #7
Walkowiak	Toni	Box #7
Wallace	Philip	Box #2
Ward	Terry	Box #5
Webb	Jacob	Box #7
Weber	Ronald	Box #2
Weidner	James	Box #7
Weisman	Brian	Box #2
Wentworth	Gayle	Box #2
Weslowski	Elaine	Box #2
White	Scott	Box #5
Whitley	Deborah	Box #7
Whitney	Moriah	Box #7
Whittle	Tamara	Box #2
Wilburn	Jennifer	Box #2
Williams	Arhon	Box #2
Williams	Gretchen	Box #2
Williams	Jacqueline	Box #2
Williams	Ellen	Box #7
Williams	Kristin	Box #7
Willoughby	William	Box #2
Willson	Howard	Box #5
Willson	Joseph	Box #2
Woolf	Elena	Box #2
Wynn	Beverly	Box #2
Yancey	Kathryn	Box #2
Yancey	Scott	Box #7
Yeskey	Dean Martin	Box #5
Young	Todd	Box #2
Zervoulis	Matthew	Box #2
Zivkovic	Milo	Box #2
Zorn	Christopher	Box #7
Zwick	Danielle	Box #2

Box #1	1998 terms
Box #2	1998 & 1999 terms
Box #3	1999 terms
Box #4	2000 terms
Box #5	2000 terms
Box #6	2001 terms

TERMINATIONS

LAST NAME	FIRST NAME
Box #7	2001 terms

EXHIBIT T

1 UNITED STATES DISTRICT COURT
for the
2 Southern District of New York

3

Civil Action No. 15-cv-07433-RWS
4
VIRGINIA GIUFFRE,
5
Plaintiff,
6
vs.
7
GHISLAINE MAXWELL,
8
Defendant.
9 ---

10 VIDEO-DEPOSITION OF: Sky Roberts

11
TAKEN BY: Defendant
12
REPORTED BY: Karla Layfield, RMR
13 Stenographic Court Reporter
Notary Public
14 State of Florida at Large

15 DATE AND TIME: May 20, 2016; 8:33 a.m.

16 PLACE: Millhorn Law Firm
11294 North US Highway 301
17 Oxford, Florida

18 APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
19 150 East 10th Avenue
Denver, Colorado 80203
20 Attorney for Defendant

21 Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
22 FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
23 Fort Lauderdale, Florida 33301
Attorney for Plaintiff

24

25 ALSO PRESENT: Kenneth Sarcony, Videographer

I N D E X

\- - -

E X H I B I T S

(Exhibits attached.)

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?
5 A I just talked to Angela.
6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?
8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.
11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.
15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?
17 A Probably from September or October to, you know,
18 maybe May, I guess.
19 Q Is that the coolest time?
20 A Times of the year, yes.
21 Q And it's more guests that come during that
22 period of time?
23 A Yes.
24 Q And is there more staff brought on during that
25 period of time?

1 A Yes.
2 Q You saw that happen every year that you were
3 there?
4 A Every year.
5 Q And in the summer, it's relatively dead because
6 it's so hot?
7 A Basically, it closed during the summer. That's
8 when we would kind of work on everything and then make
9 sure everything is up to snuff for the next year, you
10 know.
11 Q Do you remember what capacity Virginia was hired
12 to work in, what her job title was, for example?
13 A I don't know. I would have lunch with Virginia.
14 That's about as much as I know about what she did. I was
15 busy all the time.
16 Q I understand.
17 A I didn't have time to go see what she was doing.
18 I didn't really talk to Angela about what she had to do.
19 I think that was her name, Angela. But it's kind of the
20 name that sticks out.
21 Q We'll just use Angela.
22 A We'll use that as the name.
23 Q But we know it may not be Angela.
24 A It may not be.
25 Q Just because we have to call her something,

1 A Where did I learn that?
2 Q Uh-huh.
3 A I think Virginia had told me that there was a
4 lady in the spa area named Ms. Maxwell. I don't know her.
5 I couldn't tell you what she looked like.
6 But just she said Ms. Maxwell said she can get
7 me a job with Jeffrey Epstein who is a friend of Donald
8 Trump, so I figured, well, he was a good guy or whatever,
9 you know, and that she was going to learn massage therapy.
10 Q When did Virginia tell you this?
11 A Oh, I can't tell you what date and time but I
12 don't remember.
13 Q I understand.
14 Did she tell you this while she was working at
15 Mar-a-Lago?
16 A Yes. I mean, after she had been there for a
17 little bit, you know, and then she told me, yes, that she
18 could possibly get this other job.
19 Q Okay.
20 A You know.
21 Q So she worked at Mar-a-Lago for a few months?
22 MR. EDWARDS: Form.
23 THE WITNESS: I have no idea. I don't know
24 how long she worked there. I don't remember.
25 BY MS. MENNINGER:

1 A Uh-huh. Yes. It's not to me. It's up to her.
2 I think that's the way I told her, you know.
3 Q Did you ever meet Jeffrey Epstein?
4 A Once.
5 Q When was that?
6 A I dropped Virginia off at the house once and he
7 came out and I met him and seemed just fine to me. I
8 mean, you can't tell people by looking at them.
9 I mean, I know now from, you know, what I've
10 read that he's not a good guy. But you can't tell. You
11 know, you don't even know your neighbors sometimes, you
12 know.
13 Q Do you remember about when you dropped Virginia
14 off at his house that you met him?
15 A What do you mean?
16 Q Was it about the same time Virginia started
17 working with him?
18 A Yeah.
19 Q Was it later?
20 A I think it was about the time she started.
21 Because I wanted to see where she was at, you know. And
22 it was just a mansion down the street from, you know,
23 Mar-a-Lago. So I didn't think twice about it. I didn't
24 think nothing of it. He came out. He was very cordial,
25 very nice.

1 Q Do you remember any part of your conversation
2 with him?
3 A No. It was just that, you know how a parent has
4 to meet -- you know, if my daughter is going to work
5 somewhere, I just want to meet the guy and see what was
6 going on, you know. But I don't remember any
7 conversation, you know.
8 I just remember meeting him and that was it and
9 she walked into the house and --
10 Q All right. So you recall Mr. Epstein coming
11 outside of his home and greeting you?
12 A Yes.
13 Q Were you invited into his home?
14 A No.
15 Q Did you ever go inside of his home?
16 A No.
17 Q Other than that one time you dropped her off
18 there, do you ever remember going to that home?
19 A No. I couldn't tell you where it was at.
20 Q Okay. Did you meet anyone else while you were
21 there at the home?
22 A No.
23 Q Did you have a conversation with anyone else?
24 A No.
25 Q Did you every call Virginia at that home?

1 massage therapy.
2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?
5 A Not that I remember.
6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?
8 A Not to me.
9 Q Okay. Did she report them to anyone else who
10 then reported them to you?
11 A No.
12 Q Your wife, for example?
13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.
15 Q Okay. Have you ever met Ms. Maxwell?
16 A Not that I remember ever meeting her.
17 Q Do you know what she looks like?
18 A No.
19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?
21 A No.
22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?
24 A No.
25 Q Did your daughter ever move into the home where

1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, Karla Layfield, RMR, Stenographic Court
5 Reporter, do hereby certify that I was authorized to and
6 did stenographically report the foregoing deposition of
7 Sky Roberts; that said witness was duly sworn to testify
8 truthfully; and that the foregoing pages, numbered 1
9 through 142, inclusive, constitute a true and correct
10 record of the testimony given by said witness to the best
11 of my ability.

12 I FURTHER CERTIFY that I am not a relative or
13 employee or attorney or counsel of any of the parties
14 hereto, nor a relative or employee of such attorney or
15 counsel, nor am I financially interested in the action.

16 WITNESS MY HAND this day of May, 2016, at
17 Ocala, Marion County, Florida.

18

19

Karla Layfield, RMR
20 Stenographic Court Reporter

21

22

23

24

25

1 CERTIFICATE OF OATH

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, the undersigned authority, certify that Sky

5 Roberts personally appeared before me and was duly sworn

6 on the 20th day of May 2016.

7 WITNESS MY HAND AND OFFICIAL SEAL this day

8 of May 2016.

9

10

11 Karla Layfield, RMR
Notary Public
12 State of Florida at Large
My Commission No. FF942806
13 My Commission Expires 12/10/2019

14

15 Personally Known
Professionally Known
16 Produced Identification of FDL

17

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19

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21

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25

EXHIBIT U

THE MAR-A-LAGO CLUB, L.C.
EMPLOYMENT POLICIES
OCTOBER 28, 1995

TABLE OF CONTENTS

INTRODUCTION

The Mar-A-Lago Club, L.C. ("the Club") seeks to provide the quality of work which will develop the potential of each employee as well as the Club as a whole. In this regard, this policy and procedures manual is designed to acquaint each employee with the administrative and personnel practices of the Club. These guidelines provide a framework for the fair and equitable treatment of all employees regardless of location, department, manager or supervisor. Each employee should be familiar with the responsibilities and opportunities available to make work as rewarding as possible.

These policies and procedures should be read carefully and clearly understood. Each department head, manager or supervisor will be able to answer, or obtain an answer, to any questions involving interpretation or clarification of these policies and procedures. Each employee is expected to apply these general policy and procedure guidelines conscientiously in a constructive and supportive manner.

The policies in this manual are only guidelines and the Club reserves the right to add to, subtract from, or change these provisions in any way, at any time, without being bound to the previously replaced or revised provisions. This handbook is not to be construed as an employment agreement or employment contract and the Club is under no obligation to provide the benefits set forth in this manual if it determines, at a subsequent time, that these benefits are to terminate.

EQUAL EMPLOYMENT OPPORTUNITY

The Club is an equal opportunity employer which is committed to prohibiting discrimination on the basis of race, color, sex, age, religion, national origin, sexual orientation, marital status, or disability throughout the employment process, from selection through termination.

The Club intends to provide a pleasant work environment that is healthful and comfortable and will not tolerate any form of employee harassment, either verbal, written, physical, or visual, based on race, color, religion, sex, national origin, age, disability or marital status.

Harassment can take many forms. It may be, but is not limited to: words, signs, jokes, pranks, intimidation, physical contact, violence toward any employee by a fellow employee, a supervisor, or a person doing business with the Club. Harassment is not necessarily sexual in nature.

All necessary steps will be taken to comply with existing federal, state and local fair employment laws and guidelines.

ORIENTATION POLICY

The first ninety days of employment are considered to be an orientation or probationary period during which you and the Club have an opportunity to know each other. Your performance will be evaluated during this time to access your potential for continued employment. Evaluations will continue as long as you are employed, but during the orientation period your supervisor may observe and evaluate your performance more closely and more frequently to ensure that you are learning your job. During this orientation period, employees may earn but may not use vacation or personal days, except with permission of the Club Manager's office. If the employment relationship is terminated during this ninety day period, you shall not be entitled to receive any payment for benefits, e.g., personal days, vacation days, or unemployment compensation.

SEXUAL HARASSMENT

The Club strictly prohibits any form of harassment in the workplace, including sexual harassment.

Definition of Sexual Harassment:

1. Unwelcome sexual advances, requests for sexual favors, and other such verbal or physical conduct constitute sexual harassment under the following conditions:

   A. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment.

   B. Submission to or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual.

   C. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive work environment.

2. Conduct which falls into the definition of sexual harassment may include, but is not limited to:

   A. Unwelcome physical contact of a sexual nature such as patting, pinching or unnecessary touching.

   B. Overt or implied threats against an individual to induce him or her to perform sexual favors or to engage in an unwelcome sexual relationship.

   C. Verbal harassment or abuse of a sexual nature, including intimating by way of suggestion a desire for sexual relations or making jokes or remarks of a sexual nature to or in front of a person who finds them offensive.

   D. Use of sexually suggestive terms or gestures to describe a person's body, clothing, or sexual activities.

   E. Displaying or posting offensive sexually suggestive pictures or materials in the workplace.

Recourse:

3. If an employee feels that an incident of any form of harassment has occurred, the employee is encouraged to report the matter to the Club Manager's office. All such issues will be handled in strict confidence to the extent possible with minimum embarrassment to the involved parties. As in any grievance procedure, the facts of the situation will be reviewed objectively so that appropriate disciplinary action, including discharge, can be taken if misconduct has occurred.

   A timely resolution of each complaint is to be reached and communicated to the parties involved. Retaliation against any employee for filing a complaint or participating in an investigation is strictly prohibited.

   In the event an employee files a frivolous, malicious or false claim, appropriate sanctions for discipline of the complainant, including termination, may result.

CARE OF FACILITIES

The Club has made a large investment in equipment and facilities to provide each employee with the necessary resources to accomplish his/her duties.

It is the responsibility of management and each employee to treat equipment and facilities with respect and care. Neatness and cleanliness are required to maintain these resources at a level at which the employee can and will be proud. Abuse of equipment and facilities will not be tolerated and may lead to disciplinary action including discharge.

ENTRY AND EXIT OF CLUB GROUNDS/PREMISES

All employees must enter and leave the Club at the Southern Boulevard gates unless otherwise directed by management.

Employees may not enter the Club grounds/premises more than 30 minutes before the start of their scheduled shift, and employees must exit the Club grounds/premises directly after their shift ends, unless authorized by your department head.

When conducting Club business off the premises of Mar-a-Lago, you must have approval of your department head or supervisor.

Employees may not patronize the Club facilities without prior written approval of their department head.

If an employee needs to return to the property for any reason, the employee must contact their supervisor or a department head prior to their arrival. Security must be contacted in the event no supervisor is available.

PROOF OF AUTHORIZATION TO WORK

You must comply with government regulations by furnishing valid documentation of both your identity and your authorization to work. The Club Manager will advise you what documents are acceptable. If your immigration or work authorization status changes after you begin work so that you are no longer able to continue to work in the United States, you must advise your supervisor and the Human Resources Manager.

SECURITY

A. INFORMATION -

All financial, contract, production, and administrative records and information of the Club and its members are confidential. Each employee is responsible for making certain that information under his/her control is appropriately safeguarded. An employee will not provide or disclose office or guest information to third parties unless it has been determined that the party has a legitimate right to know and the request has been approved by your Supervisor.

Authorization by the Managing Director must be obtained before written contact is made of any member, client, purveyor, (current or prospective).

Any uncertainties should be cleared with the Managing Director before such information is provided.

B. CONFIDENTIALITY -

No employee shall, during the term of his/her employment or thereafter disclose to others or use, except as authorized by the Managing Director, any of the Club's confidential, technical, or other business information. "Confidential, technical or other business information" shall mean any information, including lists of the Club's vendors and customers, which the employee has used, learned or contributed during the course of his/her employment, regardless of whether it was written or in other tangible form that (i) is not generally available to the public; or (ii) gives one who uses it a competitive advantage over the Club.

C. FACILITIES -

Access to Club facilities will be limited to parties with a legitimate reason to be there. Employees are not permitted to have visitors on the premises unless special arrangements have been made by the employee's supervisor. Outside visitors will be greeted by Post One and escorted to their area of business. Each employee should feel comfortable in politely confronting an unknown individual who appears suspicious or in need of direction.

An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.

In the event of a breach or threatened breach by the employee of provisions A, B or C of this section, the Club shall be entitled to an injunction restraining the employee from disclosing or using, in whole or in part, such information or from rendering any services to any person, Club, corporation, association, or other entity to whom such information, in whole or in part, has been disclosed or is threatened to be disclosed. Nothing herein shall be construed as prohibiting the Club from pursuing other remedies available to the Club for such breach or threatened breach, including the recovery of damages from the Club.

D. GUEST PRIVACY -

Everyone enjoys privacy. Employees are prohibited from revealing any personal or business information about a Club member.

Do not divulge names or room numbers of one guest to another. Do not let a person into any guest room without verifying with the front desk that the person is the guest registered to that room.

All guest floors and areas are off limits to employees unless they are specifically assigned to perform work duties in these areas.

Employees are not allowed to accept invitations from guests to join them in their room. At no time is an employee to ask a member for an autograph or to ask a member to socialize with them off duty.

E. UNAUTHORIZED AREAS -

Employees may not enter areas of the building, especially guest floors, unless they have been assigned by a supervisor. Example:

Building Employees require work orders on guest floors.

Food Service Employees require valid room service checks or authorized pick-up request before going on the guest floors.

F. REPORTING CRIME -

The Security Department, with its able staff, attempts to control crime and provide a safe operation. Due to the enormity of the Club, they cannot be everywhere at once, and your help is needed. Follow these simple security measures:

1) Notify Security (ext. 212) of any suspicious person.

2) If you are a witness to a crime, relate to the dispatcher as much specific detail as possible, including a description of the individual and the nature of the crime.

G. MEDIA -

Because of the celebrated and historic nature of Mar-a-Lago and its significance to Palm Beach, Florida and the United States, we are contacted daily by the media (television, radio, newspapers, magazines, wire services). They want to know what is happening at the Club and they want comments for their articles or newcasts. It is important that **no** Club employee other than the Managing Director, Special Events Manager or Director of Membership comment to the press on the Club or it's members.

GUEST NAMES

All guests are to be treated in a friendly, courteous, professional manner. Systems or procedures are used within each department to inform emplyees of our guests' names. We want you to use the guests' name at all times if possible. Be friendly to guests and call them by name; however, do not be too familiar with a guest by using his/her first name.

SAFETY AND HEALTH

The Club's goal is to provide a safe and healthy environment for employees. Each employee is expected to comply with all safety and health requirements whether it is established by management or by federal, state or local law.

The Club does not expect any employee to take unnessary risks. Study the job assigned to you and learn the safety rules of your department. In everything you do, make sure that you have observed every reasonable safety precaution.

Most Club accidents are simple and common, such as slips and falls, cuts, burns, sprains and strains. They are easy to prevent. Observation of the following general rules will prevent many employee accidents:

1. Report all injuries at once to your supervisor.

2. If you are not sure how to do a job safely, ask your department head.

3. Horseplay and practical jokes are prohibited.

4. Put equipment away after use. Don't block passages.

5. Broken chairs, loose and worn carpeting, missing lights and other equipment needing maintenance may cause accidents. Report these along with any other safety hazard at once to your department head.

6. Wear the right clothing for the job.

7. Show other employees the safe way to do the job.

8. If the load seems too heavy to lift safely, get help. When lifting any load, follow the safe lifting practice listed below:

    a. Be sure you can handle it alone. If not get help.

    b. Face the load squarely.

    c. Secure a firm footing with your feet properly spread.

    d. Bend your knees.

    e. Get a grip on the load.

    f. Keep a straight back and lift by straightening your legs gradually not suddenly.

g. Keep the load close to your body.

h. Don't twist your body.

9. Do not carry a load so that it will block your vision Make sure you can see where you are going.

10. Avoid slippery, wet or greasy floors. Clean up wet or greasy spots as they occur.

11. Use a ladder to reach things that are up high. See that the ladder is firmly placed. While on the ladder, don't reach too high or too far to one side.

12. Place broken glasses, dishes, etc., in special receptacles designated for this purpose.

13. Do not operate equipment unless properly trained and specifically instructed to do so by your supervisor.

All accidents occurring on the Club's premises or to Club employees, regardless of whether they result in an injury, must be reported immediately to your supervisor. The Club is required to report all work-related injuries as soon as possible. If you are too seriously injured to describe the facts surrounding the accident, it is the responsibility of the supervisor to supply the information to the Human Resources Manager.

If a member has an accident, you should see that he or she is comfortable and then immediately notify your supervisor, department head, Managing Director and the Security Department. Any property damage due to accidents should be reported in the same manner.

WORKERS' COMPENSATION

We all do the best job we can to prevent accidents and injuries at home and at work. If you spot a safety hazard on the job, report it to your supervisor immediately. Workers' Compensation is provided by the company to pay an employee partial compensation if he or she loses time due to a work-related accident.

In case you are injured:

1. Report the inujury immediately to your supervisor.

2. Following first-aid or medical treatement, your supervisor will contact security to file an incident report and then notify the Human Resources Manager.

3. The Human Resources Manager completes the Workers' Compensation Report and submits copies to the insurance carrier. When you lose work time because of an injury on the job, a medical certificate from your doctor or the Health Center must be submitted to the Human Resources Manager with a return to work date prior to return to work.

   Remember to **report all injuries immediately**, no matter how small they may be, to your supervisor. Though the injury may seem small at first, it may become serious later, and result in lost work time.

EMERGENCY PROCEDURES:

Adhere to the following procedures in emergency situations:

A. FIRE -- In case of fire or smoke: STAY CALM

1. Pull fire alarm

2. Dial Security at Extension 212 and give location of fire, (closest room number, floor, type of fire or smoke), remain on the phone to give additional information as required.

3. When the fire department or Club fire brigade arrives, direct them to the location. Remember, most persons die from smoke and poisonous gases. Stay low to the ground if there is any smoke at all. If you encounter smoke or fire at lower levels, turn around and walk up to clearer air, or use another exit.

4. Be certain to follow instructions of the fire department and the Club fire brigade in order to ensure the safety of all guests and employees.

B. BOMB SCARE OR WARNING

You all know your own work areas, and are usually aware of any unfamiliar items. A bomb may be concealed in a length of pipe, small parcel, suitcase or paper bag. When a suspicious item is discovered DO NOT TOUCH and report immediately to:

1. Club operator - dial 300

2. Security - dial 212

C. GUEST ILLNESS

- Follow the same procedures as listed above.

The most important thing to remember in an emergency is

DO NOT PANIC!

USE OF CLUB'S COMPUTER SYSTEM AND SOFTWARE PROGRAMS:

A. GENERAL

The Club has invested a large sum of money in its computer system and software programs. The information in the computer system represents much work by many employees and is an important component of the Club. In order to protect this valuable

information, no employee is allowed to bring to work any computer games, hardware, programs or software which is not licensed and registered under the Club name, or install or otherwise use any such items unless they have been approved in advance, in writing, by the Managing Director. The reason for this is simple. Outside programs may contain viruses which can disrupt or destroy our computer system. Even if you are sure that the program you bring does not contain a virus, and that it would not damage our computer system, you are not to use any outside program without written advance approval. If software programs are not properly registered, there may be criminal and civil penalties for their use.

In addition, the Club has noted that some computer programs also contain games or programs which are not related to the work of the Club. These programs are not to be played by any employee at any time during the work day. Only computer programs that are directly related to the work of the Club are to be used on Club computers.

No employee is authorized to download or remove any information from the Club's computer system without the expressed advance permission of the appropriate supervisor. (See the Club's policy on security.)

B. ELECTRONIC MAIL

During your workday, the electronic mail and other information systems are not to be used in a way that may be disruptive, offensive to others, or harmful to morale.

Specifically, it is against Club policy to transmit E-mail communications that contain ethnic slurs, racial epithets, or anything that may be construed as harassment or offensive to others based on their race, national origin, sex, sexual orientation, age, disability, religious or political beliefs, is strictly prohibited and may constitute grounds for termination.

Employees should use the information systems for Club business only. The E-mail system also should not be used to solicit others for commercial ventures, religious or political causes, outside organizations, or other personal matters unrelated to your job.

For privacy reasons, employees should not attempt to gain access to another employee's personal file of E-Mail messages without the latter's express permission. Further, employees shall not use a code, access a file or retrieve any stored communication, other than where authorized, unless there has been prior clearance by an authorized Club representative.

Management reserves the right to enter an employee's E-mail files on an "as needed" basis by authorized personnel to ensure the Club's legitimate business interest in the proper use of its property. System security features such as passwords and message

delete functions do not neutralize the employer's ability to access any message at any time. Employees who use E-mail for private, non-job-related purposes do so at their own risk. By using the Club's equipment and E-mail systems, employees consent to have such E-mail use, messages and files monitored by authorized firm personnel.

C. VOICE MAIL

The Club utilizes a voice mail system which allows employees, clients, etc. to leave voice messages. The Club reserves the right to monitor and review all messages left on the voice mail system at any time. All voice messages should be confined to business or work-related matters.

D. RIGHT TO INSPECT

No employee is to have an expectation of privacy with regard to any voice mail messages, E-mail or computer files, and the Club has the right to monitor and review these electronic and computer systems at any time.

DISCLOSURE OF EMPLOYEE INFORMATION

REFERENCE CHECKS

All inquiries regarding a current or former employee of The Mar-a-Lago Club must be referred to the Human Resources Manager.

Should an employee receive a written request for a reference, he/she should refer the request to the Human Resources Manager for handling. No Mar-a-Lago Club employee may issue a reference letter to any current or former employee without the permission of the Human Resources Manager or Managing Director.

Under no circumstances should any Mar-a-Lago Club employee release any information about any current or former Mar-a-Lago Club employee over the telephone. All telephone inquiries regarding any current or former employee must be referred to the Human Resources Manager.

In response to an outside request for information regarding a current or former Mar-a-Lago Club employee, the Human Resources Manager will furnish or verify only an employee's name, dates of employment, job title and department. No other data or information regarding any current or former Club employee, or his/her employment witb Mar-a-Lago will be released unless the employee authorizes the Club to release such information in writing or Mar-a-Lago is required by law to furnish any information.

NO SOLICITATION/NO DISTRIBUTION

Persons who are not employees of the Club are prohibited from soliciting our employees, distributing literature, or selling merchandise to our employees, on our premises at any time. The purpose of this rule is to prevent employees and customers from being disrupted or imposed upon by such activities and to maintain our operations at peak efficiency at all times.

For similar reasons, solicitation and distribution of literature are prohibited during the working time of either the employee making the solicitation or distribution, or the targeted employee. The term "working time" does not include an employee's authorized lunch or rest periods, or other time when the employee is not required to be working.

Distribution of literature is prohibited in work and customer areas at all times. The distribution of literature in such a manner as to cause litter on the Club's property is prohibited. Off-duty employees are not allowed to return to the interior or working areas of the Club's premises until the next scheduled work time.

The Club maintains bulletin boards to communicate Club information to employees and to post notices required by law. These bulletin boards are for the posting of Club information and notices only, and only persons designated by the Managing Director may place notices on or take down material from the bulletin boards. The unauthorized posting of notices, photographs or other printed or written materials on bulletin boards or any other Club property is prohibited.

INSPECTIONS

The Club respects its employees' right to privacy. However, for security purposes, we maintain the right to inspect certain personal belongings.

Each employee agrees, as a condition of continued employment, to allow management to inspect employee personal property on our premises. Any package brought into or taken out of our premises may be inspected. Our premises and equipment, including Club vehicles, lockers and desks, are subject to inspection at any time.

Refusal to cooperate in an inspection or search will be considered a violation of your terms of hire and insubordination.

INTERNAL INVESTIGATIONS

From time to time The Mar-a-Lago Club may be required to conduct internal investigations pertaining to security, auditing or work-related matters. Employees are required to cooperate fully with and assist in these investigations if requested to do so.

Whenever necessary, in Management's discretion, employees' work areas (i.e., desks, file cabinets, etc.) and personal belongings (i.e., brief cases, handbags, etc.) may be subject to a search. Employees are required to cooperate.

Management will generally try to obtain an employee's consent before conducting a search of work areas or personal belongings, but may not always be able to do so.

OUTSIDE EMPLOYMENT

The Club does not object to your holding other jobs, provided that there is no conflict of interest and your job at the Club comes first. However, outside employment which interferes with your obligations to the Club is prohibited. In addition, no employee shall claim to be a Club representative in connection with any outside employment.

Before accepting any supplementary job, it is mandatory that you notify your Supervisor and the Department Head to determine if there is a conflict of interest or if it would adversely affect your job performance at the Club. If the Club determines that a conflict of interest exists or acceptance would adversely affect your job performance, you shall not engage in outside employment. Failure to notify the Supervisor and the Department Head in advance of any outside employment will be grounds for immediate termination.

Please note that if at any time your job at the Club suffers due to additional employment elsewhere, the Club reserves the right to ask you to give it up. Failure to comply with such a request will also be grounds for immediate termination.

PROPERTY OF EMPLOYER

Employees may not remove from the Club premises any Club property not belonging to the employee. Any other property that an employee removes from Club premises, must be accompanied by a Club Package Pass, signed by a department head or his/her designated supervisor.

Upon termination of your employment, you must surrender to the Club any and all material including, but not limited to, drawings, manuals, reports, documents, lists of the Club's vendors and customers, and the like (including all copies thereof), that you have in your possession relating to the business of the Club, or its affiliates. You recognize that all such materials are the property of the Club solely and that you have no right, title, or other interests in or to such materials.

EMPLOYEE APPRAISAL

It is the objective of the Club to provide an atmosphere in which each employee can receive periodic, thorough appraisals of their performance and compensation. The Club uses the performance evaluation as a means to achieve these objectives. Each Manager, Supervisor and employee should be familiar with their role in contributing to the success of the appraisal system.

TELEPHONE COURTESY PROCEDURES

Telephone Calls - Personal calls are prohibited,except in an emergency, since it interferes with the flow of business. Telephone courtesy is an essential part of every employee's interaction with guests. All incoming calls should be answered according to the following mandatory procedures:

1. All calls are to be answered within three rings

2. Answering a Department line:

   a. standard greeting (i.e., Good Morning/Afternoon/Evening).
   b. Give the name of the department.
   c. Give your name.
   d. Offer assistance: "Good morning, Reception Desk. This is John. How may I help you?"

3. Answering another individual's line:

   a. Standard greeting.
   b. Identify whose office or department.
   c. Give your name.
   d. Offer assistance or to take a message: "Good afternoon, Mr. Smith's office. This is Mary. How my I help you?"

4. When placing a call on "hold:"

   a. Use the word "wait," not "hold."
   b. Always ask permission and wait for guest's response: "Are you able to wait?"

5. Returning to a call placed on "hold":

   a. Always thank the guest for waiting or apologize for the wait.
   b. Give your name.
   c. Offer assistance: "Thank you for waiting, this is Mary. How may I help you?"

6. When transferring a call:

   a. Always announce the transfer of a call to the party receiving the call: "Mr. Smith, I am transferring Bob Jones to you."
   b. The caller should then be connected and an announcement of the connection made: "I have Mr. Smith on the line now. Go ahead, please."

7. When ending a conversation:

   a. Always say "thank you" or "you're welcome."
   b. Use the guest's name if possible.
   c. Let the caller know you are happy to be of service or sorry you are unable to help.
   d. End the conversation with "good-bye" and hand up the receiver gently: "Thank you for calling, Mr. Smith. We're glad we could help. Good-bye."

EMPLOYEE ATTENDANCE AND TARDINESS

Your schedule is developed after considering the Club's needs and flow of business. Your adherence to the schedule and flexibility concerning any necessary changes will help ensure our Club's success.

Each employee is required to work the hours normally scheduled for his or her assigned position.

Employee's work schedules will be those hours authorized by their Supervisor to meet operaional requirements.

If you are unable to report to work for any reason, you must notify your supervisor no later than Three (3) hours prior to your scheduled reporting time, stating your reason for lateness or absence, and when you expect to arrive at work. Check with your supervisor to see if additional notice time is required.

In the event your supervisor is not available, you are to contact SECURITY Ext.212 or the Human Resources Manager. You must call in each day of your absence. Upon the third consecutive day of absence, a Health Care Provider's note will be required of the employee before returning to work. An employee who is absent for three consecutive days without proper notice to the Club may be considered to have voluntarily resigned his or her position with the Club.

Failure to adhere to employee attendance policies results in time consuming arrangements and costly replacements and may lead to disciplinary action.

Tardiness places an unfair burden upon your supervisors and co-workers. All efforts should be made to be at work according to schedule. Your supervisor is to be contacted if it is unavoidable for you to be late to work. Continued tardiness will result in disciplinary action, up to and including termination.

LINEN ABUSE

Linen abuse is considered to be any type of mishandling or misuse of linen, causing damage to the point that the linen would be unfit to place before a guest.

The following are the most common abuse occurrences.

1. Using linen as rags for cleaning.
2. Leaving linen lying on the floor.
3. Cleaning ashtrays with linen.
4. Using napkins as food covers.
5. Carrying linen on your person to be used as sweatbands, handkerchiefs, etc.
6. Throwing rags or linen in the trash.
7. Mixing rags with linen.

Violation of these linen abuse standards may lead to disciplinary action. The replacement of lost or damaged linen is a costly process, and we need everyone's help in curtailing this enormous expense.

TIME REPORTING - SIGNING IN AND OUT

You must check in first at the guard post at the employee's entrance on Southern Boulevard, and then again upon your arrival at Post One. At the end of your shift you must check out at Post One and also at the guard post at the employees' exit on Southern Boulevard.

When reporting in and out of work employees will be solely responsible for keeping their own hours worked by logging in and out at the timekeeping terminal. Pay is calculated for the actual hours worked by the actual entry of this information. Any deviations in the schedule including overtime can be done with the supervisors approval only. These deviations are indicated in writing at the end of the work week for presentation to payroll.

Under no condition shall an employee enter for time other than his/her own. An employee who leaves the Club during his/her work schedule must first obtain their supervisor's permission. Failure to adhere to these procedures, will result in disciplinary action, up to and including termination of employment.

NOTE:All Wait Staff employees must also sign in on the ''DAILY SIGN IN SHEET'' which will be located with your Captain.

CHANGE OF ADDRESS OR STATUS - PERSONNEL RECORDS

To keep necessary Club records up-to-date, it is extremely important that you notify the Human Resources Department of any changes in:

1. Name and/or marital status.
2. Address and/or telephone number.
3. # of eligible dependents.
4. W4 Deductions.

INITIAL EMPLOYMENT PERIOD

Every new employee goes through an initial period of adjustment in order to learn about the Club and about his/her job. During this time, the employee will have an opportunity to find out if he/she is suited to, and likes, his/her new position.

Additionally, the initial employment period gives the employee's supervisor a reasonable period of time to evaluate his/her performance. The initial employment period is 3 months.

During this time, the new employee will be provided with training and guidance from his/her Supervisor. He/she may be discharged at any time during this period if his/her Supervisor concludes that he/she is not progressing or performing satisfactorily. Additionally, under appropriate circumstances, the initial employment may be extended.

At the end of the initial employment period, the employee and his/her supervisor may discuss his/her performance. Provided his/her job performance is ''satisfactory'' at the end of the initial employment period, he/she will continue in our employment.

EMPLOYEE CATEGORIES

* Full Time - Year Round Employee
* Seasonal Employee

WORK HOURS, SALARY AND OVERTIME PREMIUMS

A. WORK HOURS

The Club never shuts down from November 1 to Mother's Day; for 24 hours a day, 7 days a week, it serves the diverse needs of our members. Therefore to ensure adequate coverage at all times, departments have arranged different schedules for their employees.

B. SALARY

The Club's policy regarding personnel is to offer competitive starting wages and to maintain a fair and equitable wage structure. Wage increases are given when appropriate based upon results of performance evaluations and/or employment status change.

The work week at the Club begins on Monday and ends on Sunday. Scheduled paydays are as follows: Friday pay vouchers indicating deposit into your existing Great Western banking account will be issued.

If there is a discrepancy in your paycheck, advise your department head immediately. Do not call or go to the payroll department. If your department head is not available, contact the Human Resources Manager and assistance will be provided.

The Club is unable to make advances on employee paychecks.

C. OVERTIME PREMIUMS

1. Hourly and Salaried Employee (non-exempt)

Hourly or salaried employees are eligible for overtime premium at one and one-half (1.5) times their base hourly rate under the following conditions:

Overtime work has been specifically authorized by the direct Supervisor in advance or in writing after the fact. More than forty (40) hours are actually worked by that individual in one work week, not including sick time, vacation, holidays and time off for personal business and other non work time.

The work week commences on Monday morning and ends Sunday at midnight.

2. Salaried Employee (exempt)

A salaried exempt employee is not compensated directly for specific overtime hours worked. A salaried employee is paid to accomplish a specific job and his/her salary is based upon the fact that hours in excess of 40 per week may be necessary on occasion.

Overtime is at the request of a supervisor or department

head for emergency client business. The Supervisor must authorize overtime and sign the employee's schedule signifying such authorization.

EMPLOYEE BENEFITS AND PROGRAMS

As a regular full time year round employee you will enjoy an excellent benefits package which is designed to help protect your health, and plan for your future. The Mar-a-Lago Club reserves the right to change any or all of these benefits at any time.

* Group Health Insurance
* Group Life Insurance
* Group Dental Insurance
* 401K - After one full year of continuous employment

For information relating to the cost of such benefits, eligibility requirements, etc. please contact the Human Resources Manager.

BEREAVEMENT LEAVE

In the event of a death in an employee's immediate family, the Club will allow a maximum of three (3) days off with pay for funeral related leave. Immediate family includes spouse, child, mother, father, brother, sister, grandparent, grandchild, aunt, uncle, daughter-in-law, son-in-law, mother-in-law, father-in-law, step-child, step-parent.

When a death occurs, notify your supervisor at once with all of the details, including the family member who died and where the funeral will take place. The supervisor should notify the Human Resources Manager of the reason and length of the employee's absence.

JURY DUTY

An employee summoned for jury duty will be compensated in the following manner only if he/she notifies his/her supervisor and provides him/her with a copy of the summons.

During the jury leave, the employee will be paid the difference between jury compensation and the employee's regular pay for up to three days. Any day in which you are excused from jury service at a time when there are three (3) or more hours remaining in your daily scheduled shift, you will report for work.

NOTE: If the jury duty falls at a time when the employee cannot be away from work, the court may allow the employee to choose a more convenient time to serve if he/she makes a request in accordance with the court's procedure.

MILITARY LEAVE

An employee who is a member of the United States Army, Navy, Air Force, Marines, Coast Guard, a member of the National Guard, a member of the Reserves or Public Health Service will, where a specified period of active or reserve duty is mandatory, be granted a leave of absence in accordance with applicable law.

Upon receipt of orders for active or reserve duty, the employee should notify his/her supervisor, as well as the Human Resources Manager immediately and he/she must submit a copy of his/her orders to his/her supervisor and the Human Resources Manager.

MATERNITY LEAVE OF ABSENCE

Pregnancy, childbirth, and related medical conditions are temporary disabilities for the purpose of any health or temporary disability insurance or sick leave policy maintained by the Club. An employee who is pregnant, or has medical conditions related to pregnancy will be granted a leave of absence and will be eligible for the same leave benefits as received by employees suffering from illness or other temporary disabilities.

FAMILY MEDICAL AND PERSONAL LEAVE OF ABSENCE

As a result of the Federal Family and Medical Leave Act ("Act"), the Club provides an added benefit to each employee. Each employee will have up to 12 weeks of unpaid family leave during a "rolling" 12-month period month period for: (1) the birth and care of a newborn child; (2) adoption or foster care of a child; (3) to provide care to an employee's spouse, son, daughter or parent (or grandparent under certain circumstances) who has a serious health condition; and (4) the employee's own serious health condition which makes the employee unable to perform his/her job functions. Upon an employee's return from this leave, the Club guarantees that the employee will be placed in the same or equivalent position, absent grievous and substantial business reasons affecting the Club.

This leave may be used during the rolling 12-month period even if the full 12 weeks have not been taken. Intermittent use of this leave or a reduced leave schedule may be allowed only where leave is taken for a sick family member, or for an employee's own serious health condition, when medically necessary. If you are not eligible for the 12 weeks unpaid leave, you may still be eligible to take-an unpaid leave of absence for medical reasons or a personal leave of absence at the discretion of the Club.

As a result of the Act, it has been necessary to modify some provisions of our policies on sick days, short term disability and personal leaves of absence to comply with the Act. The information that follows is designed to address the great majority of situations that arise in a regular or routine manner. The federal Family Leave Law, however, is subject to on-going review process and interpretation by the courts, therefore, the statements made here can not possibly address every contingency that may arise in interpreting this new and broad Law. For these reasons, special situations will be reviewed on a case-by-case basis. Set forth below is the Club policy with regard to medical and personal leaves of absence, including provisions of Act.

If you have any questions, please contact the Human Resources Manager who will be glad to answer your questions.

A. <u>12 Week Family Medical Leave</u>

<u>Purpose</u>:

This policy allows an employee to request a family or regular medical leave of absence (LOA) because the employee has a serious health condition which makes the employee unable to perform the functions of the job position (this policy includes a serious health condition related to pregnancy).

Policy:

All employees with a minimum of 12 months of service (and 1250 or more hours worked during the previous 12 months) at the time the family medical LOA begins, are eligible for up to 12 weeks of unpaid family medical LOA during a rolling 12-month period. Employees are eligible so long as the employee is certified to be unable to work during this LOA period.

See Section D below for details on requesting this LOA.

B. Regular Policy for those Not Eligible for Family Medical LOA (e.g. previously used Family LOA)

All employees who are not eligible for the 12 week family medical LOA at the time the medical LOA begins (e.g., less than 12 months of service, less than 1250 hours worked, or insufficient time has passed since a previous LOA) are eligible for unpaid medical LOA normally not to exceed 10 days.

See Section D below for details on requesting this LOA.

C. Family and Personal LOA

This policy allows an employee to request consideration for a family or personal LOA.

1. Policy (Family LOA):

All employees with a minimum of 12 months of service and 1250 or more hours worked in the previous 12 months at the time the family LOA begins are eligible for up to 12 weeks of unpaid LOA during a rolling 12-month period for:

* the birth or adoption (or foster care) of a child.

* providing care to a family member who has a serious health condition (family member is defined as spouse, child, or parent).

Please Note:

A child is one who is under 18 years of age or if 18 years or older must be incapable of self-care because of mental or physical disability.

2. Policy (Personal LOA) Employees who are not eligible for the 12 weeks family LOA at the time the LOA begins (e.g., less than 1 year of service, less than 1250 hours worked, or insufficient time has passed since previous LOA) are eligible for a personal LOA without pay in the Club's sole discretion.

Employees requiring additional time may be required to terminate employment and advise the Club of availability for future rehire. Request for non-family personal LOA may not be approved due to the effect on department operations and/or due to the individual's job performance.

See Section D below for details on requesting this LOA.

D. <u>General Procedures for LOA</u>

1. While on an approved family or other LOA, an employee does not accrue time toward sick leave, vacation days, merit review nor does he/she receive holiday pay.

2. Detailed Procedures:

(a) A request for any medical LOA must be certified by the employee's health care provider on the claim form supplied by the Human Resources Manager.

(b) An employee requesting a medical LOA must provide the Human Resources Manager with sufficient medical evidence to support the condition that prevents the employee from performing the assigned job duties. This signed health care provider's statement must include effective date of the LOA, reason for the LOA and approximate date of return. If the medical evidence is deemed to be inconclusive, the Human Resources Manager may arrange for a medical examination (at the Club's expense) to determine the extent of the employee's condition. The Club may require periodic recertification.

The duration of a medical LOA is determined by the period of time the employee has a serious health condition which makes the employee unable to perform the job efficiently and safely.

(c) Reinstatement may not be guaranteed in management's discretion (employee will be notified prior to beginning the LOA) if the employee is a key salaried employee.

(d) An employee who returns from a family medical or family LOA on or before the approved LOA has elapsed will be reinstated to his/her previous department and job. Otherwise, every effort will be made to place the returning employee into an equivalent position.

However, for an employee returning from a LOA that has exceeded the allowed maximum calendar days, no

guarantee of reinstatement can be made. In addition, no guarantee of reinstatement can be made for a regular medical or non-family personal LOA. However, if possible, the employee will be re-employed in accordance with the following priorities:

* In his or her former job if available;

* In a comparable job at the same (or higher grade) if available, and if the employee is qualified for that job (at the same salary or higher);

* In a lower grade job, if available, and if the employee is qualified for that job. If reemployed, the employee will receive the same salary as he or she received immediately prior to the LOA unless such salary exceeds the maximum salary for the employee's grade upon reemployment, in which case the employee will be paid at that grade maximum; or

* If no job is available at the termination of the LOA, the employee will be placed on a preferential hiring list at the Club's sole discretion in a position for which the employee is qualified.

(e) A request for an LOA is expected to be submitted to the employee's supervisor and the Human Resources Manager at least 30 days prior to the effective date of the LOA (emergencies excepted). This request should include the effective date of the LOA, reason for the LOA and approximate date of return.

For a medical or family LOA, each employee will be required to use earned vacation, personal days and sick pay benefits at the beginning of the LOA. For a personal LOA, only earned vacation will be required to be used.

(f) For each employee granted a family medical or family LOA, the Club will continue the group health insurance benefit coverage under which the employee was covered as of the last day worked. However, any premiums paid by the employee prior to the LOA must continue to be paid by the employee during the LOA. Payments are due at the same time as they would be made by payroll deduction. If an employee fails to return to work after taking a family or medical LOA, the employee may be potentially liable for payment of health

insurance premiums paid by the employer during the LOA.

(g) An employee on an LOA must notify the Human Resources Manager of intent to return at least 7 days prior to the desired return date. Medical certification of ability to resume duties must be provided to the Human Resources Manager prior to returning to work. Failure to provide medical certification may result in disciplinary action or termination.

(h) An employee must contact the Human Resources Manager with a request for an LOA extension at least 14 days in advance of the scheduled return (emergencies excepted). Medical certification is required prior to the beginning of the extension for a medical LOA.

(i) The Human Resources Manager will notify the appropriate Manager of the date of return of an employee returning from an approved LOA.

(j) If an employee fails to return to work at the conclusion of an LOA, the LOA will be cancelled and employment will be discontinued as a voluntary termination with the effective date of termination the last day actually worked.

(k) An employee requiring a medical or personal LOA who has not completed the initial probation period is not eligible for such a LOA and must terminate his/her employment. These employees may be eligible for conversion of group medical insurance. At the Club's option this category of employee may be placed on a preferential hiring list.

(l) Abuse of an LOA may result in termination of employment.

(m) In any case in which a husband and wife are entitled to a LOA, the total days of family LOA to which both may be entitled may be limited to 12 weeks during any rolling 12-month period if the family LOA is taken for the birth, adoption (or foster care) of a child.

(n) In addition, as an alternative to the LOA, the Club and each employee may mutually agree to alternate employment for the employee for the time during which the employee would otherwise be entitled to a LOA under Club policy. Such period of alternate employment will not cause a reduction

in the period of the LOA to which the Club employee is otherwise entitled for their own serious illness.

(o) The rolling 12-month period in which the 12 weeks of LOA entitlement occurs is a "rolling" 12-month period measured backwards from the date an employee uses a family or medical LOA.

<u>Exception Approval</u>:

Questions concerning this policy should be directed to the Human Resources Manager.

GRIEVANCE PROCEDURE

The Club recognizes that employees may have questions or problems concerning the Club's policies and procedures. In order to encourage employees to voice these concerns and try to solve the questions or problems that may arise, we have a formal problem solving procedure. Please follow these steps:

Step 1: You should first request to meet with your immediate supervisor (the person you report to directly). The supervisor will listen and investigate the problem with the intention of finding an agreeable solution for those concerned. In order to facilitate a fair and timely solution, you must contact your supervisor within three days

of the occurrence that created the question or problem.

If you feel the problem is with your immediate supervisor, you may skip step 1 and start the grievance procedure with Step 2.

Step 2: Request to meet with your Department Head. Your Department Head will review the problem (including any action taken by your immediate supervisor) and any other relevant facts involved in order to suggest a reasonable solution. In order to facilitate a fair and timely solution, you must contact your Department Head within three days of the occurrence that created the question or problem (if you skipped Step 1) or within two days of your supervisor's resolution (if you followed Step 1.

If you are not satisfied with your Department Head's handling of the problem, you may proceed to Step 3.

Step 3: Request to meet with the Managing Director, or a designated representative, will thoroughly investigate the problem, review Club policies, procedures, rules and regulations and will make a determination. In order to facilitate a fair and timely solution, you must contact the Managing Director within two days of your Department Head's determination.

The Managing Director, or his or her designee, may review the matter and offer a final decision.

Time spent by an employee in discussing a complaint with management during normal working hours will be considered hours worked for pay purposes.

When two or more employees have a common or similar complaint, the employees may select a spokesperson to represent the group. The final decision on the complaint submitted by several employees through a spokesperson will be binding on all members of the group.

If at any time you feel uncomfortable with this process, as it is outlined here, please feel free to contact the Managing Director to assist you before taking further action.

Due to the serious nature of sexual harassment, such complaints should be referred immediately and directly to the Managing Director and Human Resources Manager.

The Club will not tolerate any form of retaliation against employees who have used the Club's problem solving procedure. In the interest of creating a positive and enjoyable work environment, all employees shall be able to use this procedure without fear of retaliation.

However, it is equally important to realize that the problem solving procedure will not prevent the Club from taking disciplinary action, up to and including termination, against any individual under circumstances where the Club deems disciplinary action to be appropriate.

DISCIPLINARY ACTION

A. GENERAL POLICY ADHERENCE

Policies and procedures are necessary guidelines to provide a basis for fair and equitable treatment of each employee. In addition, these guidelines serve as the basis for a fair relationship between the employee and the Club. It is necessary that these guidelines be applied consistently to each employee regardless of location, department or manager. Then, and only then, can the Club establish the confidence that each employee will be treated consistently according to the administrative and operational guidelines. It is the responsibility of each officer, manager, supervisor and employee to contribute fully toward the achievement of this objective.

B. DISCIPLINARY ACTIONS

Violations of any of the established policies and procedures may result in disciplinary action including probation or discharge. The nature of the disciplinary action is contingent upon the facts and circumstances of the individual situation.

The following employee actions are not all inclusive but, by way of illustration only, are some of the events which could result in discipline including discharge. Thus, your department head may establish additional rules and regulations he or she feels are necessary for the orderly fulfillment of your department's responsibilities. These also must be followed. Other actions may also result in discipline including discharge. (<u>It should be noted that the Club and each employee recognize that the employment relationship is for an indefinite period and may be terminated by either party at will</u>.) <u>By providing this list, the Club in no way restricts its legal discretion to terminate employment</u>.

a. Insubordination, refusal or inability to comply with reasonable instructions of supervisors or department heads. If your supervisor requests you to do something with which you disagree, always follow the instructions at the time and then discuss it later at an appropriate time and location. However, this excludes obedience to demands constituting discrimination, sexual harassment or illegal conduct.
b. Interference or hindrance with shift schedules. Failure to work on a shift as scheduled or arranging your own shift replacement without the supervisor's permission.
c. Unauthorized use of Club telephone or property and/or guest facilities.
d. Entering the Club more than 30 minutes before your shift begins or leaving the Club more than 30 minutes after the end of your shift without the permission of your department head or supervisor. Entering or

presence in areas within the Club premises without authorization or just cause.

e. Presence on Club premises at anytime other than your assigned work shift unless specifically authorized by your department head in advance.

f. An essential element of the security procedures of the Mar-a-Lago Club is the key control process. As such, employees who have access to Club keys must recognize the importance of properly safeguarding the keys which have been entrusted to them. All employees should be aware that they may be subject to disciplinary action for any violation of the key control procedures. Guest room keys must never be left in your locker.

g. Theft (unauthorized removal) or misappropriation (unauthorized storage, transfer, utilization or possession) of Club services (i.e., unauthorized telephone calls, laundry/valet, food and beverage), or guest, employer or Club property, including items found on the Club premises. All articles found on Club premises must be turned into the Lost and Found area at Security in the Timekeeper's area.

h. Altering or falsifying a guest check or credit voucher or forging tips through guest checks.

i. Refusal to comply with Club rules, policies or procedures.

j. Poor job performance, including unsatisfactory attitude that detracts from job performance or the efficient operation of the Club.

k. Violation of sexual harassment policy.

l. Failure to report for duty without a bona fide excuse and proper notification to your supervisor.

m. Failure to comply with established safety and health rules and safe work procedures or engaging in any conduct that creates a safety hazard.

n. Failure to meet performance standards.

o. Failure to follow grooming and appearance standards.

p. Failure to report a workplace accident immediately. If you are injured on the job, you must immediately report this to your supervisor or Human Resources Manager.

q. Falsely stating claims of injury.

r. Disorderly conduct on the Club premises, including fighting, horseplay or other action that endangers others or Club property.

s. Offensive or disruptive behavior, including threatening employees, using abusive or vulgar language, interfering with others in the performance of their duties, or acting in an immoral or indecent manner on Club property, or while off the Club premises in performance of Club duties.

t. Destruction, misuse, or removal of Club property, a guest's property or another employee's property.

u. Unauthorized disclosure, discussion, removal or use of Club confidential, information, trade secrets or other

proprietary information (including information contained in personnel records).

v. Deliberate omission or falsification of information on employment application, time sheets, production or other Club records.

w. Unauthorized distribution of literature, posting of notices or signs on Club, premises, fundraising, selling lottery tickets or merchandise, or soliciting donations or any other type of money raising on Club premises, unless specifically authorized by the Managing Director.

x. Refusal to allow security checks and package inspections.

y. Reading books, magazines, or newspapers while on duty, except where required in the line of duty.

z. Loitering, loafing or sleeping on duty.

aa. Neglect of duty causing defective work.

bb. Smoking anywhere on club property including 124 Woodbridge Rd. and 1094 Woodbridge Rd.

cc. Reporting for duty under the influence of intoxicating liquor, marijuana and/or illegal drugs.

dd. Bringing, consuming, possessing, providing, selling, or otherwise using intoxicating liquors, marijuana and/or illegal drugs on Club premises.

ee. Dishonesty, including but not limited to intentionally not providing full and truthful information when requested by management.

ff. Gambling on Club premises.

gg. Bringing, discharging, and/or possessing unauthorized firearms or other weapons on Club property or while off Club Property in the performance of Club duties.

hh. Giving or taking a bribe of any nature.

ii. Being arrested and/or convicted of any crime which the Club believes is detrimental to the Club and/or its other employees.

jj. Theft, attempted theft, removal or unauthorized possession of the Club's property or property of other employees or customers.

kk. Misappropriation of Club funds or failure to handle funds in accordance with Club guidelines.

ll. Irregular attendance including excessive absenteeism, tardiness and/or unexcused absences.

mm. Leaving work station or work without authorization or being in an unauthorized work area during your scheduled work period or on your days off, without your supervisor's specific authorization.

nn. Interfering with or hindering of work schedules; failing to work on a scheduled shift; or arranging your own replacement on a shift without permission from a supervisor.

oo. Failure to report to work after the expiration of a leave-of-absence or layoff.

pp. Defrauding customers of the Club.

qq. Embezzlement.

rr. Disloyalty to the Club, including but not limited to, slandering the Club, or acting in such a manner that could damage the Club's reputation.
ss. Moral turpitude.
tt. Failure to wear assigned uniform.
uu. Entering or leaving the property through any entrance or exit other than the designated employee entrance or exit.
vv. Punching in/out with another employee's I.D. Card or allowing another employee to punch in/out on your card.
ww. Unauthorized attendance at guest functions and/or in guest areas, or on the premises including guest rooms, dining rooms and lounges. No unauthorized social contact will be permitted at any time with Club guests.
xx. Discourteous or inappropriate conduct with guests/members.
yy. Using guest elevators, escalators, restrooms or any guest facility except when specifically required by job functions or authorized by management.
zz. Gum chewing, eating or drinking in any public area of the Club.
aaa. Soliciting gratuities from guests or commenting on the amount of a gratuity.

UNIFORMS AND PERSONAL APPEARANCE

A. UNIFORMS

Employees issued a uniform are responsible for turning their soiled uniform to the Laundry Department at the end of their shift and picking up a clean one for the next day of work. All employee uniforms are laundered by the Club at no charge to the employee.

B. PERSONAL APPEARANCE

Departure from conventional Club attire or personal grooming are not permitted, regardless of the nature of the job performed.

(1) Every employee has some contact with the public and therefore represents the Club in appearance as well as by actions. The properly attired employee helps to create a favorable image for the Club. Accordingly, personal appearance shall be governed by the following standards:

Good hygiene and grooming practices are required. A daily bath or shower is a necessity and all employees should report to work freshly bathed. Keep in mind you may be going from a hot kitchen to an air conditioned guest room. Body temperatures will change quickly and body odors are offensive. Remember, there is no substitute for good deodorant. Bad breath is also offensive and mouthwash should be used in addition to brushing teeth.

Good hygiene and grooming practices are required. Fingernails, and hair must be clean and neatly trimmed at all times.

Beards,goatees, and un-trimmed sideburns are not permitted. Mustaches must be neatly trimmed. Men's hair should not exceed collar length and must be conservatively styled.

Visible body piercing is not permitted for men or women, nor ear jewelry for men.

Hair must be neatly arranged and kept from covering eyes, and must be covered or restrained where required by health code.

All employees must wear their nametags (to be provided) at all times while on duty.

All employees are expected to report to work in clean, neatly pressed clothing, clean shoes and clean personal appearance.

Female employees who are not required to wear a uniform may wear suits, dresses, skirts or slacks with blouses or sweaters. ''Mini'' skirts are not permissible.

No blue jeans or jeans of any color are permitted. Denim outfits resembling blue jeans and jean skirts are also unacceptable. No strapless or backless garmets may be worn. Females must wear the proper undergarments, including a bra and a full or half slip where necessary, depending on the sheerness of the outer garment. Hose are required with skirts and dresses. Hose or socks are required with pants.

Jewelry: For safety reasons, jewelry should be kept to a minimum. Acceptable jewelry for service employees is a wrist watch and a total of three rings. Female service employees are allowed to wear one pair of small earrings (no larger than a dime). Non guest contact female employees are allowed to wear a maximum of two earrings in each ear.

Tattoos: Exposed tatoos are not allowed on any public contact employees.

FULL TIME YEAR ROUND EMPLOYEES - During the summer months when the Club is closed and there is no public contact you may see your Department Head as to what is considered to be proper attire for your position.

(2) Supervisors have the responsibility to decide when an employee's appearance is unacceptable. In the event of an unacceptable appearance, the Supervisor may request that the employee return home to change or take an appropriate corrective action. The employee generally shall not be compensated for any such time away from work, and repeated violations of this Policy will be cause for disciplinary action.

AIDS POLICY

The Club recognizes that Acquired Immune Deficiency Syndrome (AIDS), its related conditions such as AIDS Related Complex (ARC), and persons with seropositive test results pose significant and delicate issues for employees in the workplace.

Accordingly, we have established the following guidelines for handling employee issues that arise when an employee is affected by this disease.

(1) The Club is committed to maintaining a safe and healthy work environment for all employees.

(2) Consistent with this commitment, the Club will treat AIDS the same as other illnesses in terms of all our employee policies and benefits, such as group health and disability benefits.

(3) Based on the overwhelming preponderance of available medical and scientific opinion, including statements from the U.S. Public Health Service, Centers for Disease Control, there is no evidence that the AIDS virus is casually transmitted in ordinary social or occupational settings or conditions. Therefore, subject to changes in available medical information, it is the policy of the Club that employees with AIDS or any of its related conditions may continue to work and the Club will provide them with reasonable accommodation as long as they are medically able to perform the duties of their position.

(4) Employees who are affected by AIDS or any other life-threatening illness will be treated with compassion and understanding in dealing with their personal crises. Co-workers will be expected to not refuse to work or withhold their services for fear of contracting AIDS by working with an AIDS affected person, and to not harass or otherwise discriminate against an AIDS-affected employee.

(5) Recognizing the need for all employees to be able to be accurately informed about AIDS, upon request, the Club will make every effort to have information available regarding the facts about this disease, how it is transmitted and not transmitted and how best to contain it from spreading. Employees affected by AIDS or any of its related conditions or concerned about AIDS are encouraged to contact Human Resources Manager to discuss their concerns and to obtain additional information.

(6) The Club will treat all medical information obtained from employees with AIDS or any of its related conditions confidentially as required by law.

The Club reserves the right to change this policy or make appropriate revisions, additions, amendments or corrections. We will notify you of any substantive changes.

If you have any questions about this policy or its interpretation or the information upon which it is based, please contact the Human Resources Manager.

SUBSTANCE ABUSE POLICY

Our Club strives to provide a safe work environment and encourages personal health. In regard to this, the Club considers the abuse of drugs or alcohol on the job to be an unsafe and counterproductive work practice. Quite simply, our goal is to maintain a work environment that is free from the effects of alcohol and drug abuse.

While the Club has no intention of intruding into the private lives of its employees, the Club does expect employees to report for work in condition to perform their duties. It is, therefore, Club policy that an employee found with the presence of alcohol or illegal drugs in his/her system, in possession of, using, selling, trading, or offering for sale illegal drugs or alcohol during working hours, may be subject to disciplinary action up to and including discharge. (Club sponsored activities which may include the service of alcoholic beverages are not included in this provision.)

Substance Abuse includes possession, use, purchase or sale of drugs or alcohol on Club premises. It also includes reporting to work under the influence of drugs or alcohol. Prescription drugs-prescribed by the employee's physician may be taken during work hours. The employee should notify the Supervisor if the use of-properly prescribed prescription drugs will affect the employee's work performance. Abuse of prescription drugs will not be tolerated.

An employee reporting for work visibly impaired is unable to properly perform required duties and will not be allowed to work.

POLICY ON SMOKING

Smoking is prohibited by any staff employee of The Mar-a-Lago Club on any and all properties adjacent to or that of The Mar-a-Lago Club to include:

124 Woodbridge Road
Palm Beach, FL

1094 Woodbridge Road
Palm Beach, FL

DRUG/ALCOHOL USE AND TESTING

The Mar-a-Lago Club recognizes that employee drug abuse interferes with the Club's level of production, as well as its competitive position in the marketplace, and can result in costs, delays, and tragedies associated with work-related accidents. As a condition to employment or continued employment, you must refrain from reporting to work or working with the presence of drugs or alcohol in your body.

To address the problem of drug/alcohol abuse and to comply with Florida's Workers' Compensation Drug-Free Workplace Act (the Act) The Mar-a-Lago Club adopts the policies and procedures detailed below. This policy will be administered in accordance with all relevant laws (state and local), including the ADA, the Florida Civil Rights Act, the Workers' Compensation Act, and in a non-discriminatory fashion.

To protect the health, safety, and welfare of all Mar-a-Lago Club employees, it is the Club's policy that the unlawful manufacture, distribution, dispensation, possession, or use of controlled substance on any Club property is absolutely prohibited. Controlled substances include, but are not limited to, amphetamines, barbiturates, cocaine, heroin, morphine, PCP, marijuana, hashish, and any other controlled substance listed in Schedules I through V of Section 202 of the Controlled Substance Act, 21 U.S.C. ξ 812 or in the Florida Statute on controlled substances, except for medication prescribed by the employee's physician.

You are also prohibited from drinking alcohol during the business day. You are also prohibited from bringing alcoholic beverages onto the Club premises. Special care shall be taken during Company-sponsored social events for employees. In these cases, employees and guests below the legal age will not be allowed to drink alcoholic beverages. The amount of time alcohol is served will be limited as well as the quantity of the alcohol. If necessary, transportation will be arranged for someone if his or her driving ability seems to be impaired.

The Mar-a-Lago Club will test for the presence of drugs under the following circumstances: 1) pre-employment testing, 2) reasonable suspicion testing (including post-accident incidents), and 3) follow-up testing. Such testing will be done in accordance with the Worker's Compensation Drug Testing Program, which policy had been given to all employees or can be obtained from the Human Resources Manager. Refusal to submit to the test or having a confirmed, positive test result will result in immediate discipline, including termination. Any questions about this policy should be referred to the Human Resources Manager.

Any violation of The Mar-a-Lago Club's Drug/Alcohol Free Workplace Policy will result in appropriate discipline, up to and including **termination**.

THIS POLICY REPRESENTS THE MAR-A-LAGO CLUB'S CURRENT POLICY FOR DEALING WITH A SERIOUS NATIONAL PROBLEM WHICH POSES A SAFETY THREAT TO THE WORKFORCE. THIS POLICY MAY BE CHANGED BY THE MAR-A-LAGO CLUB IN ITS DISCRETION. THIS POLICY IS NOT INTENDED TO CREATE A CONTRACT BETWEEN THE MAR-A-LAGO CLUB AND ANY EMPLOYEE. NOTHING IN THIS POLICY CHANGES THE CLUB'S ABILITY TO TERMINATE AN EMPLOYEE AT WILL, WITH OR WITHOUT CAUSE OR NOTICE.

MISCELLANEOUS

A. STAFF CAFETERIA

For the purpose of control, the Cafeteria must remain for use of Club employees only. Any exceptions to this rule must be cleared by your department head in advance. In addition, all employees must adhere to the rules posted in the Cafeteria concerning its use. You are entitled to one meal per eight hour shift only.

B. LOCKERS

Those employees issued lockers are obligated to keep them clean and use them for storage of a change of clothing only. Lockers are not the areas for storage of valuables. Lockers are subject to inspection by management. Unauthorized materials such as alcoholic beverages, weapons, Club property and illegal drugs are prohibited. The Mar-a-Lago Club is not responsible for lost or stolen property.

C. PHONES

Employees on duty are not allowed to use the public phones in the lobbies or any guest areas. Phones are furnished outside the staff dining room for employee use.

D. LOST AND FOUND ARTICLES

You must turn in lost and found articles to your supervisor, the Security Department or a security officer at Post One.

E. GIFTS

Gifts from guests of the Club of a value exceeding $25.00 are not to be accepted by employees of The Mar-a Lago Club unless approved in writing by the Department Head. No employee shall accept any gift from any vendor.

F. **''RIGHT TO KNOW STATION"**

The Occupational Safety Hazard Administration requires all employees be provided with information of all potentially hazardous substances used in the course of our daily business. The location of these documents (Material Safety Data Sheets) is in the staff dining room on the wall adjoining the Food and Beverage office.

G. EMPLOYEE ENTRANCE AND EXIT

All employees required to log in and log out their daily time must enter and exit the building through the entrance on the east side of the house leading to Post One.

TERMINATION PROCEDURES

Clearance Process

a. Clearance of locker.

b. Return of uniform to Laundry.

c. Nametag, locker key, any property keys, and uniform returned to Executive Office.

d. Any outstanding accounts settled.

NOTE: If you abandon your job without notice, your final paycheck will not be mailed until you have returned to the Club and completed the clearance process.

IF YOU LEAVE EMPLOYMENT

RESIGNATION POLICY

When an employee decides to leave for any reason, his/her supervisor and the Human Resources Manager would like the opportunity to discuss the resignation before final action is taken. The Mar-a-Lago Club often finds during such a conversation that another alternative may be better. If, however, after full consideration the employee decides to leave, it is expected that the employee will provide the Club with a written two-week advance notice period (bear in mind that vacation days or personal days may not be included in the two-week notice period). Generally, in order to qualify for payment of earned unused vacation, the employee must work throughout the notice period. If, as sometimes hapens, the employee's supervisor believes it advisable for the employee to leave prior to the end of the employee's two-weeks notice, the employee may be paid for the remainder of that period. Note: You are not entitled to be paid for any unused, accrued sick time.

DISMISSALS

Every Mar-a-Lago employee has the status of ''employee-at-will'', meaning that no one has a contractual right, express or implied, to remain in The Mar-a-Lago Club's employ. The Club may terminate an employee's employment, or an employee may terminate his/her employment, with or without cause, and with or without notice, at any time. No supervisor or other representative of the Club (except the owner) has the authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the above.

IMMEDIATE DISMISSALS - MISCONDUCT

Any employee whose conduct, actions or performance violates or conflicts with the Club's policies may be terminated immediately and without warning.

The following are some examples of grounds for immediate dismissal of an employee:

*Breach of trust or dishonesty
*Conviction of a felony
*Willful violation of an established policy or rule
*Falsification of Club records
*Gross negligence
*Insubordination
*Fighting or serious breach of acceptable behavior
*Violation of the Alcohol or Drug Policy

*Theft
*Violation of the Club's Conflict of Interest/Outside Employment Policy and/or Confidentiality Policy.

This listing is not exhaustive.

Should the employee be covered in our group health plan, all benefits will cease on the last day of the month in which the employee's last day of employment falls. The employee will then have the option to continue coverage in accordance with COBRA regulations.

In the event that the employee is asked to leave his/her employment with The Mar-a-Lago Club due to the above misconduct, the employee will not be entitled to any earned unused vacation benefits. Also, the employee will not be entitled to be paid for any unused accrued sick time.

DISMISSALS - OTHER THAN IMMEDIATE TERMINATION

All employees are expected to meet the Club's standards of work performance. Work performance encompasses many factors, including attendance, punctuality, personal conduct, job proficiency and general compliance with the Club's policies and procedures.

If an employee does not meet these standards, the Club, may, under appropriate circumstances, take corrective action, up to and including dismissal.

The intent of corrective action is to formally document problems while providing the employee with a reasonable time within which to improve performance. The process is designed to encourage development by providing employees with guidance in areas that need improvement such as poor work performance, attendance problems, personal conduct, general compliance with the Club's policies and procedures and/or other disciplinary problems.

Supervisors should use the procedure described below except in those cases which may require an employee's immediate termination.

WRITTEN WARNINGS:

The supervisor should discuss the problem and present a written warning to the employee. This should clearly identify the problem and outline a course of corrective action within a specific time frame. The employee should clearly understand both the corrective action and the consequence (i.e., termination) if the problem is not corrected or recurs. The employee should acknowledge receipt of the warning and include any additional comments of their own before signing it. A record of the discussion and the employee's comments should be placed in the employee's personnel file.

POST RESIGNATION/TERMINATION PROCEDURES

The Human Resources Manager is responsible for scheduling an exit interview with a terminating employee on the employee's last day of employment and for arranging the return of Club property including:

1. Club issued credit card
2. Club manuals
3. Office keys
4. Beeper
5. Two-way radio
6. Any additional club-owned or issued property

In order to receive a disbursement of any amounts due from the Retirement Plan, the employee is required to complete and sign a distribution form which can be obtained from the Human Resources Manager. Specific information will be provided at the exit interview.

Employees may choose the continuation of medical benefits under COBRA. Specific information will be provided by the Human Resources Manager at the exit interview.

Benefits (Life and Medical) end on the last day of the month in which the employee's last day of employment falls. An employee has the option to continue Medical Benefits in accordance with The Consolidated Omnibus Budget Reconciliation Act (''COBRA'') regulations.

Employees leaving the Club must return office keys, club credit cards, etc., before their final paycheck can be issed. This final paycheck will be mailed during the next normal pay period. If there are unpaid obligations to the Club, the final paycheck will reflect the appropriate deductions.

VACATION PAY

Vacation pay is calculated in accordance with our vacation policy. If the employee took more vacation days than he/she was entitled to under the vacation policy, the time will be deducted from the employees final paycheck.

RETIREMENT PLAN

If an employee is in the retirement plan, information regarding this plan will be provided at the exit interview.

EMPLOYEE HANDBOOK RECEIPT

INSTRUCTIONS: PLEASE READ THIS PERSONNEL POLICIES AND PROCEDURES EMPLOYEE HANDBOOK CAREFULLY. IF YOU DO NOT UNDERSTAND ANY PORTION OF IT, ASK FOR AN EXPLANATION FROM THE CLUB MANAGER'S OFFICE. RETURN THIS SIGNED RECEIPT TO THE CLUB MANAGER'S OFFICE IMMEDIATELY AFTER YOU HAVE RECEIVED THIS MANUAL. PLEASE KEEP THE HANDBOOK FOR FUTURE REFERENCE.

I received the Policy Manual of The Mar-A-Lago Club, L.C. on the date indicated below. I will carefully read the policies, procedures, and other information contained in the Manual and will ask the Club Manager's office for an explanation if I do not fully understand them. I agree as a condition of my employment to comply with the policies and procedures which exist now or which may come into existence in the future. I understand that if I do not comply with the policies and procedures, I may be subject to disciplinary action. **I also understand that I or the Club may terminate employment at any time, for any reason.**

The Club reserves the right to modify or terminate any policies or procedures, in whole or in part, at any time, with or without notice. I understand that only the Managing Director is authorized to set policy or make any promises with respect to my employment. The language used in this Handbook is not intended to create, nor is it to be construed to constitute, a contract between the Club and any one or all of its employees.

_________________________ ____________________________

Date Employee's Name

____
Employee's Signature

159816

EXHIBIT V

Vicki Yawnick:

Please run the following this Saturday October 14 and Sunday October 15:

THE MAR-A-LAGO CLUB

Private Club in Palm Beach now
seeking qualified individuals for
the following seasonal positions:

***Wait Staff**
***Asst. Food Server**
***Banquet Servers**
***P.M Sous Chef**
***Asst. Banquet Chef**
***Line Cooks**
***Pastry Cooks**
***Steward**
***Dishwashers**
***Housekeepers-** 11pm-3am
***Houseperson** – 11 pm-3am
***Valet** – must have a clean
driving record.
***Salon Asst.**
***Nail Technician**
***Make-Up Artist** – Part Time
***License Massage Therapist**-must
have experience in wet treatments.
***Esthetician**
***Spa Attendants** – College students
encourage to apply.

Call Carol Ash, M-F, 9am-5pm,
(561) 833-8767, ext. 313 or fax
resume to (561) 832-2194.
Drug/Smoke Free Workplace. EOE

EXHIBIT W

APPLICATION FOR EMPLOYMENT

PRE-EMPLOYMENT QUESTIONNAIRE
EQUAL OPPORTUNITY EMPLOYER

CALL

PERSONAL INFORMATION

DATE 3 26 02

NAME (LAST NAME FIRST): Roberts Virginia L

PRESENT ADDRESS: [redacted] | CITY: Loxahatchee | STATE: FL | ZIP CODE: 33470

PERMANENT ADDRESS: [redacted] | CITY | STATE | ZIP CODE

PHONE NO.: (561) 790-4919

REFERRED BY: Michelle, Stacey, & Mr. Pinkwasser

EMPLOYMENT DESIRED

POSITION	DATE YOU CAN START	SALARY DESIRED
Reception / animal help	a.s.a.p	negotiable

ARE YOU EMPLOYED? [X] YES [ ] NO — IF SO, MAY WE INQUIRE OF YOUR PRESENT EMPLOYER? [X] YES [ ] NO

EVER APPLIED TO THIS COMPANY BEFORE? [ ] YES [X] NO — WHERE? — WHEN?

EDUCATION HISTORY

	NAME & LOCATION OF SCHOOL	YEARS ATTENDED	DID YOU GRADUATE?	SUBJECTS STUDIED
GRAMMAR SCHOOL				
HIGH SCHOOL	Survivors Charter	4	yes	highschool Diploma
COLLEGE				
TRADE, BUSINESS OR CORRESPONDENCE SCHOOL				

GENERAL INFORMATION

SUBJECTS OF SPECIAL STUDY/RESEARCH WORK OR SPECIAL TRAINING/SKILLS: I enjoy being around & helping animals, When I was younger I volunteered for 6 years at Vinceremos Riding clinic, learing about animals

U.S. MILITARY OR NAVAL SERVICE: — | RANK: —

FORMER EMPLOYERS (LIST BELOW LAST FOUR EMPLOYERS, STARTING WITH LAST ONE FIRST)

DATE MONTH AND YEAR	NAME & ADDRESS OF EMPLOYER	SALARY	POSITION	REASON FOR LEAVING
FROM 1-02 TO 3-26-02	TGI7	2.15 + Tips	Server	Didnt leave
FROM 1-01 TO 1-02	MASSAGE Therapy	hourly	Training massause	my Trainer got ill
FROM 4-99 TO 1-01	Cookwoodsnest	8.50	Bird manager	School for MASSAGE
FROM 6-98 TO 4-99	N.B.R.C	9.25	Bird caretaker	Too long of Days

Adams 9661 APR 1998

APPLICATION FOR EMPLOYMENT

CONTINUED ON OTHER SIDE

EXHIBIT 9 Giuffre AGREN BLANDO REPORTING

REFERENCES GIVE BELOW THE NAMES OF THREE PERSONS NOT RELATED TO YOU, WHOM YOU HAVE KNOWN AT LEAST ONE YEAR.

NAME	ADDRESS	BUSINESS	YEARS KNOWN
Mara Figueroa	[redacted]	Food	2
Bob Pavlik	[redacted]	Food delivery	5
Anthony Richards	[redacted]	Cashier	1½

AUTHORIZATION

"I certify that the facts contained in this application are true and complete to the best of my knowledge and understand that, if employed, falsified statements on this application shall be grounds for dismissal.

I authorize investigation of all statements contained herein and the references and employers listed above to give you any and all information concerning my previous employment and any pertinent information they may have, personal or otherwise, and release the company from all liability for any damage that may result from utilization of such information.

I also understand and agree that no representative of the company has any authority to enter into any agreement for employment for any specified period of time, or to make any agreement contrary to the foregoing, unless it is in writing and signed by an authorized company representative.

This waiver does not permit the release or use of disability-related or medical information in a manner prohibited by the Americans with Disabilities Act (ADA) and other relevant federal and state laws."

DATE 3-26-02 SIGNATURE Virginia Roberts

INTERVIEWED BY ______ DATE ______

DO NOT WRITE BELOW THIS LINE

REMARKS

Until 3PM
Very sweet, fluffy
Repeatedly set off alarm in office
~~Attendance issues~~
Failure to perform
Suspect drugs
call in sick, late

EXCUSES:
– ENGINE FELL OUT
– BROKEN AXEE
– STUFF SET ON FIRE

NEATNESS	CHARACTER
PERSONALITY	ABILITY

HIRED	FOR DEPT.	POSITION	WILL REPORT	SALARY WAGES

APPROVED: 1. ______ EMPLOYMENT MANAGER 2. ______ DEPARTMENT HEAD 3. ______ GENERAL MANAGER

Monday, November 7, 2016
1Quicken Data - All Accounts

QuickReport by Description

8/12/69 through 1/29/03

Date	Account	Num	Payee	Memo	Category	Clr
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		*split*	R
5/6/02	Courtyard Animal Hospital	1522	VOIDvirginia Roberts			R
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		*split*	R
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		*split*	R
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		*split*	R

Total 8/12/69 - 1/29/03

Total Inflows
Total Outflows

Net Total

QuickReport by Description

8/12/69 through 1/29/03

Amount
-407.68
0.00
-380.35
-325.16
-156.08
-1,269.27
0.00
-1,269.27
-1,269.27

Monday, November 7, 2016
1Quicken Data - All Accounts

Category Detail Report

4/1/02 through 7/1/02

Date	Account	Num	Payee	Memo	Category	Clr	Amount
Income/Expenses							
Expenses							
Salary							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Salary	R	-507.50
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Salary	R	-472.50
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Salary	R	-399.75
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Salary	R	-182.00
Total Salary							-1,561.75
Taxes:							
Social security							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Taxes:Social security	R	38.82
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Taxes:Social security	R	36.15
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Taxes:Social security	R	30.59
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Taxes:Social security	R	13.92
Total Social security							119.48
Witholding							
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		Taxes:Witholding	R	61.00
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		Taxes:Witholding	R	56.00
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		Taxes:Witholding	R	44.00
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		Taxes:Witholding	R	12.00
Total Witholding							173.00
Total Taxes							292.48
Expenses - Other							
5/6/02	Courtyard Animal Hospital	1522	VOIDvirginia Roberts			R	0.00
Total Expenses - Other							0.00
Total Expenses							-1,269.27
Total Income/Expenses							-1,269.27

April 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[redacted]	Social Security	$ [redacted]	$ [redacted]		$ [redacted]
	Withholding	$ [redacted]	$ [redacted]		$ [redacted]
[redacted]	Social Security	$ [redacted]	$ [redacted]		$ [redacted]
	Withholding	$ [redacted]	$ [redacted]		$ [redacted]
[redacted]	Social Security	$ [redacted]	$ [redacted]		$ [redacted]
	Withholding	$ -	$ [redacted]		$ [redacted]
[redacted]	Social Security	$ [redacted]	$ [redacted]		$ [redacted]
	Withholding	$ [redacted]	$ [redacted]		$ [redacted]
Jenna	Social Security		$ 38.82		$ 38.82
	Withholding		$ 61.00		$ 61.00
[redacted]	Social Security		$ [redacted]		$ [redacted]
	Withholding		$ [redacted]		$ [redacted]

Monthly Totals			
Social Security	$ [redacted]	x2=	$ [redacted]
Withholding	$ [redacted]		$ [redacted]
Total Liability			$ [redacted]

May 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[redacted]	Social Security	$ [redacted]	$ [redacted]	$ [redacted]	$ [redacted]
	Withholding	$ [redacted]	$ [redacted]	$ [redacted]	$ [redacted]
[redacted]	Social Security	$ [redacted]	$ [redacted]		$ [redacted]
	Withholding	$ [redacted]	$ [redacted]		$ [redacted]
[redacted]	Social Security	$ [redacted]	$ [redacted]		$ [redacted]
	Withholding	$ [redacted]	$ [redacted]		$ [redacted]
[redacted]	Social Security	$ [redacted]			$ [redacted]
	Withholding	$ -			$ -
Jenna	Social Security	$ 36.15	$ 30.59		$ 66.74
	Withholding	$ 56.00	$ 44.00		$ 100.00
[redacted]	Social Security				$ -
	Withholding				$ -

Monthly Totals

Social Security	$ [redacted]	x2=	$ [redacted]
Withholding	$ [redacted]		$ [redacted]

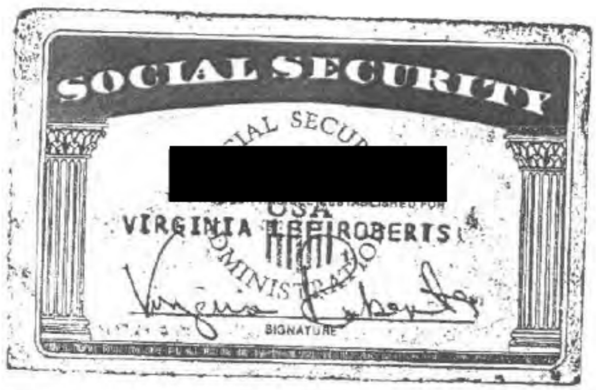
Total Liability $[redacted]

June 2002 Payroll

		Paycheck 1	Paycheck 2	Paycheck 3	Total
[illegible]	Salary		[illegible]		$ [illegible]
	Social Security	$ -	$ [illegible]	$ -	$ [illegible]
	Withholding	$ -	$ [illegible]	$ -	$ [illegible]
[illegible]	Salary	$ [illegible]	$ [illegible]		$ [illegible]
	Social Security	$ [illegible]	$ [illegible]		$ [illegible]
	Withholding	$ [illegible]	$ [illegible]		$ [illegible]
[illegible]	Salary	$ [illegible]	$ [illegible]		$ [illegible]
	Social Security	$ [illegible]	$ [illegible]		$ [illegible]
	Withholding	$ [illegible]	$ [illegible]		$ [illegible]
[illegible]	Salary				$ -
	Social Security				$ -
	Withholding	$ -			$ -
Jenna	Salary	$ 182.00			$ 182.00
	Social Security	$ 13.92	$ -		$ 13.92
	Withholding	$ 12.00	$ -		$ 12.00
[illegible]	Salary				$ -
	Social Security				$ -
	Withholding				$ -

Monthly Totals			
Salary			$ [illegible]
Social Security	$ [illegible]	x2=	$ [illegible]
Withholding	$ [illegible]		$ [illegible]
Total Liability			$ [illegible]


The Sunshine State
Florida
DRIVER LICENSE
CLASS E
VIRGINIA LEE ROBERTS
LOXAHATCHEE, FL 33470-4921
UNDER 21 UNTIL 08-09-04
ORGAN DONOR
P010112070332
Operation of a motor vehicle constitutes consent to any sobriety test required by law.


SOCIAL SECURITY
VIRGINIA LEE ROBERTS
SIGNATURE

05/29/2001 13:12 3055533343 ALLEN SHAPPE PAGE 01

Form W-4 (2001)

Purpose. Complete Form W-4 so your employer can withhold the correct Federal income tax from your pay. Because your tax situation may change, you may want to refigure your withholding each year.

Exemption from withholding. If you are exempt, complete only lines 1, 2, 3, 4, and 7, and sign the form to validate it. Your exemption for 2001 expires February 18, 2002.

Note: *You cannot claim exemption from withholding if (1) your income exceeds $750 and includes more than $250 of unearned income (e.g., interest and dividends) and (2) another person can claim you as a dependent on their tax return.*

Basic instructions. If you are not exempt, complete the **Personal Allowances Worksheet** below. The worksheets on page 2 adjust your withholding allowances based on itemized deductions, certain credits, adjustments to income, or two-earner/two-job situations. Complete all worksheets that apply. They will help you figure the number of withholding allowances you are entitled to claim. However, you may **claim fewer (or zero) allowances.**

Head of household. Generally, you may claim head of household filing status on your tax return only if you are unmarried and pay more than 50% of the costs of keeping up a home for yourself and your dependent(s) or other qualifying individuals. See line E below.

Tax credits. You can take projected tax credits into account in figuring your allowable number of withholding allowances. Credits for child or dependent care expenses and the child tax credit may be claimed using the **Personal Allowances Worksheet** below. See Pub. 919, How Do I Adjust My Tax Withholding? for information on converting your other credits into withholding allowances.

Nonwage income. If you have a large amount of nonwage income, such as interest or dividends, consider making estimated tax payments using **Form 1040-ES,** Estimated Tax for Individuals. Otherwise, you may owe additional tax.

Two earners/two jobs. If you have a working spouse or more than one job, figure the total number of allowances you are entitled to claim on all jobs using worksheets from only one Form W-4. Your withholding usually will be most accurate when all allowances are claimed on the Form W-4 for the highest paying job and zero allowances are claimed on the others.

Check your withholding. After your Form W-4 takes effect, use Pub. 919 to see how the dollar amount you are having withheld compares to your projected total tax for 2001. Get Pub. 919 especially if you used the Two-Earner/Two-Job Worksheet on page 2 and your earnings exceed $150,000 (Single) or $200,000 (Married).

Recent name change? If your name on line 1 differs from that shown on your social security card, call 1-800-772-1213 for a new social security card.

Personal Allowances Worksheet (Keep for your records.)

A Enter "1" for **yourself** if no one else can claim you as a dependent . . . **A** 1

B Enter "1" if:
- You are single and have only one job; or
- You are married, have only one job, and your spouse does not work; or
- Your wages from a second job or your spouse's wages (or the total of both) are $1,000 or less.

. . . **B** 1

C Enter "1" for your **spouse.** But, you may choose to enter -0- if you are married and have either a working spouse or more than one job. (Entering -0- may help you avoid having too little tax withheld.) . . . **C** 0

D Enter number of **dependents** (other than your spouse or yourself) you will claim on your tax return . . . **D** 0

E Enter "1" if you will file as **head of household** on your tax return (see conditions under **Head of household** above) . . . **E** ___

F Enter "1" if you have at least $1,500 of **child or dependent care expenses** for which you plan to claim a credit . . . **F** 0

(Note: *Do not include child support payments. See Pub. 503, Child and Dependent Care Expenses, for details.*)

G Child Tax Credit (including additional child tax credit):
- If your total income will be between $18,000 and $50,000 ($23,000 and $63,000 if married), enter "1" for each eligible child.
- If your total income will be between $50,000 and $80,000 ($63,000 and $115,000 if married), enter "1" if you have two eligible children, enter "2" if you have three or four eligible children, or enter "3" if you have five or more eligible children. . **G** 0

H Add lines A through G and enter total here. (**Note:** *This may be different from the number of exemptions you claim on your tax return.*) ▶ **H** 2

For accuracy, complete all worksheets that apply.
- If you plan to **itemize or claim adjustments to income** and want to reduce your withholding, see the **Deductions and Adjustments Worksheet** on page 2.
- If you are **single,** have more than one job and your combined earnings from all jobs exceed $35,000, or if you are married and have a working spouse or more than one job and the combined earnings from all jobs exceed $60,000, see the **Two-Earner/Two-Job Worksheet** on page 2 to avoid having too little tax withheld.
- If **neither** of the above situations applies, **stop here and enter the number from line H on line 5 of Form W-4 below.**

Cut here and give Form W-4 to your employer. Keep the top part for your records.

Form **W-4** Department of the Treasury Internal Revenue Service

Employee's Withholding Allowance Certificate

▶ **For Privacy Act and Paperwork Reduction Act Notice, see page 2.**

OMB No. 1545-0010 **2001**

1 Type or print your first name and middle initial: Virginia L   Last name: Roberts

Home address (number and street or rural route): [redacted]

3 ☒ Single ☐ Married ☐ Married, but withhold at higher Single rate.
Note: If married, but legally separated, or spouse is a nonresident alien, check the Single box.

City or town, state, and ZIP code: [illegible handwriting] 34[illegible]

4 **If your last name differs from that on your social security card, check here. You must call 1-800-772-1213 for a new card.** ▶ ☐

5 Total number of allowances you are claiming (from line H above or from the applicable worksheet on page 2) **5** 0

6 Additional amount, if any, you want withheld from each paycheck . . . **6** $ 0 —

7 I claim exemption from withholding for 2001, and I certify that I meet both of the following conditions for exemption:
- **Last** year I had a right to a refund of **all** Federal income tax withheld because I had no tax liability **and**
- This year I expect a refund of all Federal income tax withheld because I expect to have no tax liability.

If you meet both conditions, write "Exempt" here . . . ▶ **7**

Under penalties of perjury, I certify that I am entitled to the number of withholding allowances claimed on this certificate, or I am entitled to claim exempt status.

Employee's signature (Form is not valid unless you sign it) ▶ Virginia Roberts   **Date** ▶ 5/16/01

8 Employer's name and address (Employer: Complete lines 8 and 10 only if sending to the IRS.)   9 Office code (optional)   10 Employer identification number

Cat. No. 10220Q

Courtyard Animal Hospital
13860-31 Wellington Trace
Wellington, FL 33414
(561) 784-7387

Ms. Roberts (jenna),

It is obvious that you have a number of personal issues going on that need your immediate attention and keep you from being able to focus on and perform the material duties of your job here at Courtyard Animal Hospital.

In the short time you have been employed here, you have missed multiple days, arrived late, called in sick multiple times. The reasoning you have given has shown that you are "distracted" at minimum. Between your "engine falling out of your car, your axle breaking off which your boyfriend 'repaired it roadside' and your landlord tossing all your furniture and clothing out in the front yard and setting it on fire", it is clear that you have more pressing issues in your life to focus on. You have been unable to perform to an acceptable standard within our company.

It is because of your inability to perform your duties here, be in attendance when scheduled and focus on the job requirements that we are forced to terminate your employment.

Dr. Pinkwasser

EXHIBIT X

```
Date:  4/25/16        ROYAL PALM BEACH POLICE DEPARTMENT          Page:        1
Time:  8:52:02                 Offense Report                  Program: CMS301L

Day Of Week   . : Sunday                    Report Date    . : 6/10/01 21:25
Occur From Date: 6/10/01 21:00              Occur To Date    : 6/10/01 21:05
Dept Class . . : BURGLARY - Non-Vehicle
Street Number  : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
Zone/division  : Zone One (1)  (No of Okee)
Location Type  : APARTMENT/CONDO            Case Status    . : EXCEPTIONALLY CLEARED
Report Officer : WOOD, FRANK                Supervisory Emp: HUGHES, THOMAS   6/17/01
Case Status Dt : 8/21/01

************ C A S E   M A N A G E M E N T   I N F O R M A T I O N ************
Case Number   . : 1-01-002214               Dept Class . . : BURGLARY - Non-Vehicle
Case Status   . : EXCEPTIONALLY CLEARED     Case Status Dt : 8/21/01
Investigator  . : KACZOR, K.

                         ***ASSIGNMENT HISTORY***
Case Number   . : 1-01-002214               Dept Unit   . . : DETECTIVE
Investigator  . : KACZOR, KENNETH           Supervisor  . . : ROBKIN, ROBERT
Assignment Date: 6/19/01

******************** O F F E N S E     R E P O R T  #   1 ******************
State Class   . : Burglary  - Non-Vehicle
Attmpt/Commit  : Committed                  Statute/Ordin   : 810.02(4B)
Forced Entry  . : Yes                       Premises Enter  : 1
Structure Occup: Unoccupied

******************** O F F E N S E     R E P O R T  #   2 ******************
State Class   . : Assault Simple            Attmpt/Committ : Committed
Statute/Ordin  : 784.03(1A)                 Weapon Type   . : Hands/Fists/Feet

********* O F F E N S E   P R I M A R Y   R E L A T I O N S H I P S ***********
Offense #:     001 Burglary  - Non-Vehicle / / 810.02(4B)
    Name #...:  001    (SUSP) UNKNOWN,
    Name #...:  001    (VICT) AUSTRICH, JAMES M.
Offense #:     002 Assault Simple / / 784.03(1A)
    Name #...:  001    (SUSP) UNKNOWN,
    Name #...:  001    (VICT) AUSTRICH, JAMES M.

************** S U S P E C T / A R R E S T E E   I N F O R M A T I O N -  # 1 **
Case Number   . : 1-01-002214               Prompt valid in: UNKNOWN,
City . . . . . : ROYAL PALM BEACH, FL 33411
Home Phone No. : 561/000-0000              Business Phone : 561/000-0000
Race . . . . . : Unknown                    Sex  . . . . . : Unknown
Ethnic Origin  : Hispanic

************** W I T N E S S   I N F O R M A T I O N -  # 1 *****************
Case Number   . : 1-01-002214               Last Name   . . : PERKINS JR, JOHN MARTIN
Street Number  : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
County . . . . : PALM BEACH                 Home Phone No. : [redacted]
Business Phone : [redacted]                 Birth Date . . : [redacted]
Birth Country  : Unknown
Oper Lic No. . : [redacted]        FL United States
Race . . . . . : White                      Sex  . . . . . : Male
```

1-01-002214 (Continued)

Ethnic Origin : WHITE

************** V I C T I M I N F O R M A T I O N - # 1 ********************

Case Number . : 1-01-002214 Prompt valid in: AUSTRICH, JAMES MICHAEL
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
County . . . . : PALM BEACH Home Phone No. : [redacted]
Business Phone : 561/000-0000 Birth Date . . : [redacted]
Birth Country : Unknown Oper Lic Cntry : Unknown
Race . . . . . : White Sex . . . . . . : Male
Ethnic Origin : WHITE Victim Type . : Adult

********* O T H E R P E R S O N I N F O R M A T I O N - # 1 *********

Case Number . : 1-01-002214 Last Name . . : ROBERTS, VIRGINIA L
Person Type . : OTHER PERSON
Street Number : 368 BENT OAK DR
City . . . . . : ROYAL PALM BEACH, FL 33411
County . . . . : PALM BEACH Home Phone No. : [redacted]
Business Phone : 561/714-5252 Birth Date . . : [redacted]
Birth Country : Unknown Oper Lic Cntry : Unknown
Race . . . . . : White Sex . . . . . . : Female
Ethnic Origin : WHITE Height . . . . : 506
Weight . . . . : 103

***************************** N A R R A T I V E # 1 ***************************

Original Report Reported By: WOOD, FRANK T. 6/10/01
Entered By.: JARRETT, DAWN M. 6/21/01

ON SUNDAY, JUNE 10, 2001 AT APPROXIMATELY 2124 HOURS, I RESPONDED TO [redacted], ROYAL PALM BEACH, FLORIDA IN REFERENCE TO A BATTERY COMPLAINT. UPON MY ARRIVAL I MET WITH THE VICTIM JAMES MICHAEL AUSTRICH. [redacted] AUSTRICH STATED THAT HIS EX-FIANCE VIRGINIA ROBERTS, WHO ALSO RESIDES AT THE ABOVE LISTED ADDRESS, BROUGHT HER FRIEND ANTHONY TO THE APARTMENT. AUSTRICH AND UNKNOWN SUSPECT ANTHONY DIDN'T GET ALONG. THE SUSPECT THEN BECAME VERBALLY ABUSIVE TO AUSTRICH. AUSTRICH THEN TOLD ANTHONY TO LEAVE THE APARTMENT. ANTHONY THEN BECAME AGITATED AND AGAIN AUSTRICH TOLD HIM TO LEAVE. AUSTRICH'S FRIEND JOHN PERKINS WAS PRESENT DURING THE ALTERCATION AND STATED IN A SWORN WRITTEN STATEMENT THAT HE ALSO TOLD ANTHONY TO LEAVE THE APARTMENT. PERKINS WAS IN FEAR THAT AUSTRICH AND ANTHONY WERE GOING TO FIGHT. ANTHONY FINALLY LEFT THE APARTMENT. AUSTRICH GOT THE APARTMENT DOOR CLOSED ANTHONY THEN REOPENED THE DOOR AND ENTERED THE APARTMENT WITHOUT AUSTRICH'S PERMISSION, AND PUNCHED AUSTRICH ON THE LEFT SIDE OF HIS FACE WITH A CLOSED FIST CAUSING MINOR SWELLING AND A LARGE RED MARK. PERKINS THEN WENT TO THE TELEPHONE AND CALLED POLICE. ANTHONY OBSERVED PERKINS ON THE TELEPHONE AND FLED THE SCENE PRIOR TO MY ARRIVAL.

AUSTRICH ALSO PROVIDED ME WITH A SWORN WRITTEN STATEMENT. I ASKED AUSTRICH IF HE NEEDED MEDICAL TREATMENT? AUSTRICH VERBALLY STATED THAT HE DID NOT NEED ANY MEDICAL TREATMENT.

1-01-002214 (Continued)

*************************** N A R R A T I V E # 2 ***************************

SUPPLEMENT Reported By: WOOD, FRANK T. 6/16/01
Entered By.: JARRETT, DAWN M. 6/21/01

SINCE 6/10/01 NUMEROUS ATTEMPTS BY TELEPHONE AND IN PERSON HAVE BEEN MADE TO GET MORE SUSPECT INFORMATION. NOR JAMES AUSTRICH, JOHN PERKINS, AND OR VIRGINIA ROBERTS HAVE BEEN AT THE RESIDENCE OR ANSWERING MY TELEPHONE MESSAGES, AT THIS TIME I WISH CLASSIFY THIS CASE AS INACTIVE DUE TO SUSPECTS LACK OF COOPERATION.

*************************** N A R R A T I V E # 3 ***************************

SUPPLEMENT Reported By: KACZOR, KENNETH A. 8/14/01
Entered By.: KACZOR, KENNETH A. 8/14/01
Reviewed By: PERVENECKI, DAVID A. 8/21/01

I have attempted contact with the victim numerous times and have been unsuccessful. Messages left with roommates have been ignored and the victim has refused to call me regarding this case. This case is exceptionally cleared due to the victim's lack of cooperation.

* * * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * * * *

EXHIBIT Y

PROBABLE CAUSE AFFIDAVIT

OBTS Number

1. Arrest 2. N. 3. Request for Warrant 4. Request for Capias — 1 — Juvenile ☒

ADMIN.

Agency ORI Number: FLO 5 0 2 8 0 0

Agency Name: ROYAL PALM BEACH POLICE DEPARTMENT

Agency Report Number: 8 6 - 9 9 3 0 4 6

Charge Type: Check as many as apply.
☒ 1. Felony
☐ 2. Traffic Felony
☐ 3. Misdemeanor
☐ 4. Traffic Misdemeanor
☐ 5. Ordinance
☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): FIGUEROA, ANTHONY — Alias — Race: W — Sex: M — Date of Birth: [redacted]

CHARGES

Charge Description: POSS OF MARIJUANA OVER 20 GRAMS
Charge Description: POSS. WITH INTENT TO SELL
Charge Description: POSS OF DRUG PARAPHERNALIA
Charge Description: POSS OF CONTROLLED SUBSTANCE

VICTIM

Victim's Name (Last, First, Middle): STATE OF FLORIDA — Race — Sex — Date of Birth

Local Address (Street, Apt., Number) (City) (State) (zip) Phone — Address Source

Business Address (Name, Street) (City) (State) (zip) Phone — Occupation

PROBABLE CAUSE STATEMENT

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.
The Person taken into custody ...

☒ committed the below acts in my presence.
☐ confessed to ______ admitting to the below facts.
☐ was observed by ______ who told ______ that he/she saw the arrested person commit the below acts.
☐ was found to have committed the below acts, resulting from my (described) investigation.

On the 19TH day of NOVEMBER, 19 99 at 5:00 ☐ A.M. ☒ P.M. (Specifically include facts constituting cause for arrest.)

THE ROYAL PALM BEACH POLICE DEPARTMENT WITH MUTUAL AID FROM THE LAKE WORTH POLICE DEPARTMENT, PERFORMED A SEARCH WARRANT AT [redacted]. PRESENT INSIDE THE [redacted] RESIDENCE WAS ANTHONY FIGUEROA, [redacted] [redacted]. ALL OCCUPANTS WERE READ THEIR MIRANDA RIGHTS BY OFFICER HECKLER (#115).
THE SEARCH OF THIS RESIDENCE REVEALED THE FOLLOWING:
INSIDE ANTHONY FIGUEROA'S BEDROOM (NORTHWEST BEDROOM) WAS APPROX 106 GRAMS OF SUSPECT MARIJUANA HIDDEN INSIDE A CAMOUFLAGE BAG, NEXT HIS BED ON THE BOTTOM SHELVE OF A BOOK RACK. THIS SUSPECT MARIJUANA WAS INDIVIDUALLY WRAPPED IN PLASTIC 12 BAGS, PACKAGE FOR SALE. LOCATED IN ANOTHER BOOK SHELVE WAS A SMALL PILL BOX WHICH ACCORDING TO ANTHONY FIGUEROA WAS "X-TASY" OR MDMA, WHICH IS A CONTROLLED SUBSTANCE. THROUGHOUT ANTHONY FIGUEROA'S BEDROOM WERE NUMEROUS USED NOS CANISTERS, A GLASS SMOKING PIPE, A BLACK BOX CONTAINING CRUSHED CIGARS INTERNALS, BALLOONS FOR "HUFFING", ALONG WITH POSTERS THAT CONTAINED MARIJUANA PLANTS AND DRUG REFERENCES. ALSO LOCATED IN THE BOOK SHELVE WERE PHOTOS NEGATIVES OF ANTHONY FIGUEROA SMOKING FROM A LARGE "BONG". WHEN LAKE WORTH POLICE ENTERED [redacted]., THEY DISCOVERED ANTHONY FIGUEROA INSIDE THE COMMON BATHROOM. A SEARCH OF THIS BATHROOM BY OFC. STRONG REVEALED A PLASTIC BAG CONTAINING 16 GMS OF SUSPECT MARIJUANA HIDDEN BETWEEN TWO TOWELS IN THE CLOSET. JUVENILE REFERRAL WAS ISSUED TO THE PARENT. NOTHING FURTHER.

ADMINISTRATIVE

SWORN AND SUBSCRIBED BEFORE ME [signature]
NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER
11-19-99
DATE

[signature]
SIGNATURE OF ARRESTING / INVESTIGATING OFFICER
OFC. SEARING
NAME OF OFFICER (PLEASE PRINT)
11-19-99
DATE

PAGE 1 OF 1

DISTRIBUTION: WHITE -- Court Copy GREEN -- State Attorney YELLOW-- Agency PINK -- Agency GOLDENROD --

PROBABLE CAUSE AFFIDAVIT

1. Arre[redacted] 2. N.T[redacted] | 3. Request for Warrant 4. Request for Capias | 1 | Juvenile ☒

ADMIN.

OBTS Number

Agency ORI Number: FLO 5 0 2 8 0 0

Agency Name: ROYAL PALM BEACH POLICE DEPARTMENT

Agency Report Number: 8 6 - 9 9 - 3 0 4 6

Charge Type: Check as many as apply.
☒ 1. Felony
☐ 2. Traffic Felony
☐ 3. Misdemeanor
☐ 4. Traffic Misdemeanor
☐ 5. Ordinance
☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueroa, Anthony

Alias

Race: W | Sex: M | Date of Birth: [redacted] 8 2

CHARGES

Charge Description: Poss. marijuana over 20 gms.

Charge Description: Poss. with intent to sell

Charge Description: Poss. of Drug Paraphernalia

Charge Description: Poss. of Controlled Substance (MDMA)

VICTIM

Victim's Name (Last, First, Middle): State Of Florida

Race | Sex | Date of Birth

Local Address (Street, Apt., Number) (City) (State) (zip) Phone | Address Source

Business Address (Name, Street) (City) (State) (zip) Phone | Occupation

PROBABLE CAUSE STATEMENT

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.
The Person taken into custody ...

☐ committed the below acts in my presence.
☐ confessed to ______________ admitting to the below facts.
☐ was observed by ______________ who told ______________ that he/she saw the arrested person commit the below acts.
☒ was found to have committed the below acts, resulting from my (described) investigation.

On the ______ day of April 2000 19 XX at ______ ☐ A.M. ☒ P.M. (Specifically include facts constituting cause for arrest.)

****************AMENDED PROBABLE CAUSE *****************

On 04-13 -00, I received from Evidence Custodian Fanelli, one pill inside a purple pill case seized from the search warrant executed on 11-19-99 on Anthony Figueroa residence. The purpose of this was to test this one pill for the presence of MDMA, using a heroin test kit. The pill tested positive for the presence of MDMA by turning the color black. It should be noted that on 11-19-1999, after Anthony Figueroa was read his Miranda rights, he was interviewed and admitted that the pill inside the purple case was indeed ecstasy or MDMA. This pill has a "Batman" symbol imprinted on it. This pill was placed back into evidence. Based on this information, I believe probable cause now exists for the poss. of a controlled substance (MDMA). Note, all suspect marijuana seized at [redacted]. tested positive for narcotic content.

This amended probable cause was sent to S/A Debra Colton for charge purposes. Nothing further.

ADMINISTRATIVE

SWORN AND SUBSCRIBED BEFORE ME [signature]

NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER

04-17-2000
DATE

[signature]
SIGNATURE OF ARRESTING / INVESTIGATING OFFICER

Officer George Searing 101
NAME OF OFFICER (PLEASE PRINT)

04-17-2000
DATE

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION W

ORIGINAL

STATE OF FLORIDA

CASE NO. 00-4937CF A02
ISSUE WARRANT

vs.

ANTHONY LUIS FIGUEROA, W/M, [redacted]

INFORMATION FOR:

1) POSSESSION OF SCHEDULE I SUBSTANCE
2) POSSESSION OF MARIJUANA IN EXCESS OF 20 GRAMS
3) POSSESSION OF PARAPHERNALIA (PRODUCTION)
4) POSSESSION OF PARAPHERNALIA (USE)

In the Name and by Authority of the State of Florida:

BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of a substance classified within Schedule I, Florida Statute 893.03(4), commonly known as MDMA, a controlled substance, contrary to Florida Statute 893.13(6)(a). (3 DEG FEL)

COUNT 2: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of more than 20 grams of a material, compound, mixture or preparation which contained cannabis, commonly known as marijuana, a controlled substance, contrary to Florida Statute 893.13(6)(a). (3 DEG FEL)

COUNT 3: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of bags, and/or a pill box, and/or a box, which was drug paraphernalia being used, intended for use, or designed for use in planting, propogating, cultivating, growing, harvesting, manufacturing, compounding, converting, producing, processing, preparing, testing, analyzing, packaging, repackaging, storing, containing or concealing a controlled substance, contrary to Florida Statute 893.147(1)(a). (1 DEG MISD)

COUNT 4: Informant aforesaid, under oath, further information makes that ANTHONY LUIS FIGUEROA on or about November 19, 1999, in the County of Palm Beach and State of Florida, was unlawfully and knowingly in actual or constructive possession of a pipe, and/or balloons, which was drug paraphernalia being used, intended for use, or designed for use in injecting, ingesting, inhaling, or otherwise introducing into the human body a controlled substance, contrary to Florida Statute 893.147(1)(b). (1 DEG MISD)

DEBRA COLTUN
FL. BAR NO. 0561622
Assistant State Attorney
Palm Beach County, Florida

SA 00CJ001567A02

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, DEBRA COLTUN Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Assistant State Attorney

Sworn to and subscribed to before me this 2 day of ~~April~~ MAY 2000.

NOTARY PUBLIC, State of Florida

Citation Nos. (if applicable) ; ; ;

Elida Pasharikov
MY COMMISSION # CC643398 EXPIRES
April 29, 2001
BONDED THRU TROY FAIN INSURANCE, INC.

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.
THIS 8 DAY OF Aug, 2016
SHARON R. BOCK
CLERK & COMPTROLLER
By
DEPUTY CLERK

SA 00CJ001567A02

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT, IN AND FOR PALM BEACH COUNTY, FLORIDA

SENTENCE

(Probation/Community Control Violator)

(As to Count(s) 1)

Defendant ANTHONY FIGUEROA

Case Number NOV 21 2000

OBTS Number ___ HY H. WILKEN, CLERK CIRCUIT & COUNTY COURTS (CRIM. DIV.)

The Defendant, being personally before this Court, accompanied by the defendant's attorney of record, T. Gilliam, and having been adjudicated guilty herein, and the Court having given the Defendant an opportunity to be heard and to offer matters in mitigation of sentence, and to show cause why defendant should not be sentenced as provided by law, and no cause being shown, and the Court having placed the Defendant on probation/community control and having subsequently revoked the Defendant's probation/community control for violation(s) of condition(s) 5.

IT IS THE SENTENCE OF THE COURT that:

The Defendant pay a fine of $Ø pursuant to §______, Fla. Stat., plus $______ as the 5% surcharge (of the fine imposed) required by F.S. 960-25, which shall be deposited in the Crimes Compensation Trust Fund.

The Defendant is hereby committed to the custody of the

[ ] Department of Corrections
[ ] Sheriff of Palm Beach County, Florida

for a term of 30 DAYS. It is further ordered that the Defendant shall be allowed a total of 3 days as credit for time incarcerated prior to imposition of this sentence. It is further ordered that the composite term of all sentences imposed for the counts specified in the order shall run

[ ] consecutive to [✓] concurrent with (check one) the following:
[✓] Any active sentence being served.
[ ] Specific sentences: ______________________.

In the event the above sentence is to the Department of Corrections, the Sheriff of Palm Beach County, Florida is hereby ordered and directed to deliver the Defendant to the Department of Corrections together with a copy of the Judgment and Sentence, and any other documents specified by Florida Statue.

The defendant in open court was advised of right to appeal from this Sentence by filing notice of appeal within thirty days from this date with the Clerk of the Court, and the Defendant's right to the assistance of counsel in taking said appeal at the expense of the state upon showing of indigency.

DONE AND ORDERED in Open Court at West Palm Beach, Palm Beach County, Florida this 21 day of NOV, 2000.

[signature]
CIRCUIT COURT JUDGE
EDWARD A. GARRISON

(rev. 12/98)

GM_01227

22

95

IN THE CIRCUIT COURT OF THE 15TH JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR PALM BEACH COUNTY

CASE NO. 004937CF A02 DIV. W

STATE OF FLORIDA

v.

Anthony L. Figueroa
DEFENDANT
32 W/M

[ ] COMMUNITY CONTROL VIOLATOR

[X] PROBATION VIOLATOR

FILED

NOV 21 2000

DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS
(CRIM. DIV.)

JUDGMENT

The above Defendant, being personally before this Court represented by T. Gilliam APD (attorney)

[ ] Having been tried and found guilty of the following crime(s):

[X] Having entered a plea of guilty to the following crime(s):

[ ] Having entered a plea of nolo contendere to the following crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE	CASE NUMBER	OBTS NUMBER
1	Poss Scheduled Subs (VOP)	893.13	3F		

[X] and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

[ ] and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.

SENTENCE STAYED

[ ] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on [ ] Probation and/or [ ] Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order).

SENTENCE DEFERRED

[ ] The Court hereby defers imposition of sentence until ______

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at West Palm Beach, Palm Beach County, Florida, this 21 day of Nov 2000

CIRCUIT COURT JUDGE

EDWARD A. GARRISON

GM 01228 21

(rev. 1/97)

EXHIBIT Z

Date: 4/25/16 ROYAL PALM BEACH POLICE DEPARTMENT Page: 1
Time: 8:51:59 Offense Report Program: CMS301L

Day Of Week . . : Friday
Report Date . : 8/03/01 23:43
Occur From Date: 8/03/01 20:00
Occur To Date : 8/03/01 23:42
Dept Class . . : THEFT/LARCENY
Street Number : HIDDEN HARBOR, [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
Zone/division : Zone Two (2) (So of Okee/E thr Wil)
Location Type : APARTMENT/CONDO
Case Status . : OPEN / NOT ACTIVE
Report Officer : LLEWELLYN, CRAIG
Supervisory Emp: MURPHY, THOMAS 8/06/01
Case Status Dt : 8/03/01

************ C A S E M A N A G E M E N T I N F O R M A T I O N ************

Case Number . : 1-01-003008
Dept Class . . : THEFT/LARCENY
Case Status . : OPEN / NOT ACTIVE
Case Status Dt : 8/03/01

******************** O F F E N S E R E P O R T # 1 ********************

State Class . : Larceny - From Building
Attmpt/Committ : Committed
Statute/Ordin : 812.014(2C1)

********* P R O P E R T Y I N F O R M A T I O N # 1 *********************

Category . . . : STOLEN
UCR Prop Type : CURRENCY, NOTE, ETC.
Quantity . . . : 5
Description . : US CURRENCY
Value . . . . : 500.00
Property type : CURRENCY/NEGOTIABLE

************** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **

Case Number . : 1-01-003008
Prompt valid in: UNKNOWN,
City . . . . . : ROYAL PALM BEACH, FL 33411
Home Phone No. : 561/000-0000
Business Phone : 561/000-0000
Race . . . . . : Unknown
Sex . . . . . : Unknown
Ethnic Origin : Hispanic

************** V I C T I M I N F O R M A T I O N - # 1 ********************

Case Number . : 1-01-003008
Prompt valid in: ROBERTS, VIRGINIA L
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
County . . . . : PALM BEACH
Business Phone : 561/714-5252
Birth Country : Unknown
Race . . . . . : White
Ethnic Origin : WHITE
Weight . . . . : 103
Victim Type . : Juvenile

********* O T H E R P E R S O N I N F O R M A T I O N - # 1 *********

Case Number . : 1-01-003008
Last Name . . : FIGUEROA, ANTHONY L
Person Type . : OTHER PERSON
Street Number : [redacted]
City . . . . . : ROYAL PALM BEACH, FL 33411
County . . . . : PALM BEACH
[redacted] : [redacted]
Business Phone : 561/000-0000
[redacted] : [redacted]
Birth Country : Unknown
Oper Lic Cntry : Unknown
Race . . . . . : White
Sex . . . . . : Male
Ethnic Origin : WHITE
Juvenile . . . : ADULT

********* O T H E R P E R S O N I N F O R M A T I O N - # 2 *********

Case Number . : 1-01-003008
Last Name . . : SWITZER, KYLE M

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

1-01-003008 (Continued)

```
Person Type   . : OTHER PERSON
Street Number   : [redacted]
City . . . . .  : ROYAL PALM BEACH, FL 33411
County . . . .  : PALM BEACH                  [redacted]       : [redacted]
Birth Date . .  : [redacted]                  Birth Country    : Unknown
Oper Lic No. .  : [redacted]     FL United States
Race . . . . .  : White                       Sex . . . . .    : Male
Ethnic Origin   : WHITE

********* O T H E R   P E R S O N   I N F O R M A T I O N - # 3 *********
Case Number   . : 1-01-003008                 Last Name . . .  : RIGEL, DUSTIN
Person Type   . : OTHER PERSON
Street Number   : [redacted]
City . . . . .  : LOXAHATCHEE, FL 33470
County . . . .  : PALM BEACH                  [redacted]       : [redacted]
Business Phone  : 561/000-0000                [redacted]       : [redacted]
Birth Country   : Unknown                     Oper Lic Cntry   : Unknown
Race . . . . .  : White                       Sex . . . . . .  : Male
Ethnic Origin   : WHITE

********* O T H E R   P E R S O N   I N F O R M A T I O N - # 4 *********
Case Number   . : 1-01-003008                 Last Name . . .  : JEFFERSON, CRAIG
Person Type   . [redacted]
Street Number   [redacted]
City . . . . .  [redacted]
County . . . .  [redacted]
Business Phone  [redacted]
Birth Country   [redacted]
Race . . . . .  [redacted]
Ethnic Origin   [redacted]

********* O T H E R   P E R S O N   I N F O R M A T I O N - # 5 *********
Case Number   . : 1-01-003008                 Last Name . . .  : URVIS, SCOTT
Person Type   . : [redacted]
Street Number   : [redacted]
City . . . . .  : [redacted]
County . . . .  : [redacted]
Business Phone  : [redacted]
Birth Country   : [redacted]
Race . . . . .  : [redacted]
Ethnic Origin   : [redacted]

********* O T H E R   P E R S O N   I N F O R M A T I O N - # 6 *********
Case Number   . : 1-01-003008                 Last Name . . .  : RISDEN, RICHARD ARTHUR
Person Type   . : OTHER PERSON
Street Number   : [redacted]
City . . . . .  : ROYAL PALM BEACH, FL 33411
County . . . .  : PALM BEACH                  Home Phone No.   : [redacted]
Business Phone  : 561/000-0000                Birth Date . . . : [redacted]
Birth Country   : Unknown
Oper Lic No. .  : [redacted]     FL United States
Race . . . . .  : White                       Sex . . . . . .  : Male
```

1-01-003008 (Continued)

Ethnic Origin : WHITE Height . . . . : 511
Weight . . . . : 160

*************************** N A R R A T I V E # 1 ***************************

Original Report Reported By: LLEWELLYN, CRAIG R. 8/03/01
Entered By.: JARRETT, DAWN M. 8/16/01

ON 080301 AT 2343 HOURS I WAS DISPATCHED TO ███ ███████ IN REFERENCE TO A SUSPICIOUS INCIDENT. UPON ARRIVAL I MADE CONTACT WITH VIRGINIA ROBERTS AND ANTHONY FIGUEROA THE RESIDENTS OF ███ ████ ███. V. ROBERTS STATED THAT EARLIER IN THE EVENING SHE HAD SEVERAL PEOPLE VISITING HER AND A. FIGUEORA. V. ROBERTS STATED THAT WHILE THE PEOPLE WHERE IN HER APARTMENT, ONE OF THEM WENT INTO HER BEDROOM AND REMOVED $500.00 CASH FROM HER WALLET. V. ROBERTS STATED THAT SHE DOES NOT KNOW WHICH OF HER VISITORS TOOK THE MONEY. A. FIGUEROA STATED THAT V. ROBERTS WALLET WAS LOCATED IN A POCKET OF A SHIRT WHICH WAS INSIDE THE CLOSET OF THE MASTER BEDROOM. A. FIGUEROA STATED THAT HE SPOKE TO ALL OF THE VISITORS ABOUT THE MISSING MONEY, AND THAT NO ONE ADMITTED TO TAKING IT. V. ROBERTS AND A. FIGUEROA STATED THAT SEVERAL OF THE VISITORS HAD ALREADY LEFT PRIOR TO MY ARRIVAL, AND THAT THEY COULD NOT PROVIDE NAME OR CONTACT INFORMATION FOR THOSE THAT ALREADY LEFT.

I THEN MADE CONTACT WITH THE REMAINING VISITORS RICHARD RISDEN, SCOTT ORVIS, CRAIG JEFFERSON, DUSTIN RIGEL, AND KYLE SWITZER, A RESIDENT OF ███ ████ ███. ALL INDIVIDUALS STATED THAT THEY WERE NOT RESPONSIBLE FOR TAKING THE MONEY NOR DID ANY OF THEM KNOW WHO TOOK IT.

I TOOK THE NECESSARY INFORMATION FROM V. ROBERTS AND A. FIGUEROA AND PROVIDED ME WITH A VICTIM'S RIGHTS SHEET THAT CONTAINED A CASE NUMBER. NO FURTHER SUSPECT INFORMATION AT TIME OF REPORT.

* * * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * * * *

EXHIBIT AA

PALM BEACH COUNTY SHERIFF'S OFFICE PAGE 1
CASE NO. 02075321 OFFENSE REPORT CASE NO. 02075321
DISPOSITION: ZULU
DIVISION: ROAD PATROL

CIVIL MATTER * * *
SIGNAL CODE: 66 CRIME CODE: NON CRIME CODE: CC CODE: 9566 06/02/02 SUNDAY
ZONE: A81 GRID: 3C21 DEPUTY I.D.: 6933 NAME: WIKSE JOHN ASSIST: TIME D 2148 A 2159 C 2249
OCCURRED BETWEEN DATE: 06/02/02 , 2148 HOURS AND DATE: , 0000 HOURS
EXCEPTION TYPE:
INCIDENT LOCATION: 13475 N 24 CT APT. NO.:
CITY: LOXAHATCHEE STATE: FL ZIP: 33470

NO. OFFENSES: 00 NO. OFFENDERS: 00 NO. VEHICLES STOLEN: 0 NO. PREMISES ENTERED: 0
LOCATION:
NO. VICTIMS: 00 NO. ARRESTED: 0 FORCED ENTRY: 0

..
NAME LIST:
ROLE:
OTHER PHILLIP E RATCLIFFE
SEX: M RACE: W HT: 509 WT: 165 HR
OTHER LORRI M DEPASQUA
SEX: F RACE: W HT: 504 WT: 120 HR
OTHER VIRGINIA L ROBERTS
SEX: F RACE: W HT: 504 WT: 108 HR
RESIDENTIAL ADDRESS: 155 SANTIAGO ST
BUSINESS PHONE: 561 000-0000
COMPLAINANT ANTHONY L FIGUEROA
..

ON JUNE 2, 2002 AT 2148 HOURS, I WAS DISPATCHED TO 13475 24TH COURT, NORTH, LOXAHATCHEE, FLORIDA IN REFERENCE TO A REPORT OF A CIVIL DISPUTE.

UPON ARRIVAL, I MET WITH WHITE FEMALE, VIRGINIA L. ROBERTS, DATE OF BIRTH [redacted] AND WHITE MALE, ANTHONY L. FIGUEROA, DATE OF BIRTH [redacted], WHO WERE STANDING AT THE END OF THE DRIVEWAY ACCESS TO THE PROPERTY.

THERE WAS A PILE OF PERSONAL EFFECTS (I.E. A LAMP, CLOTHING AND OTHER

printed by Employee Id #: 8557 on April 22, 2016 03:09:29PM

MISCELLANEOUS ITEMS) NEXT TO THEM.

VIRGINIA EXPLAINED THAT THEY HAD BEEN LIVING AT THE RESIDENCE FOR APPROXIMATELY FOUR MONTHS AND THAT THEY HAD MADE AN AGREEMENT WITH THE LANDLORD TO VACANT THE PROPERTY AS OF 060102. SHE CONCLUDED BY STATING THEY HAD TRANSPORTED ONE LOADED OF THEIR BELONGINGS AND HAD RETURNED FOR THE REMAINING ITEMS WHEN THEY FOUND THEM AT THE END OF THE DRIVEWAY IN DAMAGE CONDITION. ADDITIONALLY, THEY HAD LEFT A MATTRESS THAT WAS NOW BURNING ON THE PROPERTY.

I WENT OUT TO THE PROPERTY AND MADE CONTACT WITH THE LANDLORD, A WHITE MALE, PHILLIP E. RADCLIFFE, III, DATE OF BIRTH [redacted]. PHILLIP STATED THAT PRIOR TO LEAVING, ANTHONY AND VIRGINIA MADE STATEMENTS SUCH AS "YOU CAN KEEP THE REST YOU BASTARD!" THIS STATEMENT AS WELL AS OTHERS WERE WITNESS BY WHITE FEMALE, LORRI M. DESPAQUA, DATE OF BIRTH [redacted]. PHILLIP STATED THAT THERE WAS A SUBSTANTIAL AMOUNT OF TIME SINCE THEIR DEPARTURE FROM PHILLIP. HE FELT THAT THEY HAD DISCARDED THE ITEMS SO HE PLACED THEM OUT FOR TRASH PICKUP. HE ALSO STATED THAT THE MATTRESS WAS COVERED IN CAT URINE SO HE BURNED IT FOR SANITARY PURPOSES.

ALL PARTIES WERE ADVISED THAT AN INFORMATION REPORT WILL BE COMPLETED IN REGARD TO THE INCIDENT AND EXPLANATION OF CIVIL REMEDIES WERE GIVEN.

IT SHOULD NE NOTED THAT VIRGINIA PRIOR TO LEAVING ADVISED ME THAT SHE WOULD PROVIDE ME WITH A LIST OF DAMAGE AND/OR RUIN ITEMS AS SOON AS POSSIBLE.

D/S J. WIKSE/ID 6933/TRANS: 060502/BH
DICT: 060302/1418 HRS.

printed by Employee Id #: 8557 on April 22, 2016 03:09:29PM

EXHIBIT BB

Date 1995 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
17	G1159B	N908JE	CMH	PBI		779	JE		2	0
20	"	"	PBI	TEB		780	JE, AS		2	2
21	"	"	TEB	PBI		781	JE, AS, EVA, GLENN, BABY, 1 FEMALE		2	4
26	"	"	PBI	TEB		782	GM, MATT GRIPPI, AS, ALAN GREENBERG, MRS GREENBERG, EVA, GLENN, BABY, NANNY		2	4
29	"	"	TEB	CMH		783	JE, SOPHIE BIDDLE, 3 MALES		1	3
30	"	"	CMH	PBI		784	JE, SOPHIE BIDDLE	1/1	2	0
DEC 3	"	"	PBI	TEB		785	JE, SOPHIE BIDDLE		2	2
5	"	"	TEB	PBI		786	JE, AS		2	3
1996 JAN	"	"	PBI	TEB		787	JE, GM, GWENDOLYN BECK, CHUCK SCHUMI, DAVID ANTON		2	1
4	"	"	TEB	PBI		788	JE, SOPHIE BIDDLE		2	5
9	"	"	PBI	TEB		789	JE, AS, SOPHIE BIDDLE		2	3
12	"	"	TEB	PBI		790	JE, GM, DEBORAH		4	0
20	"	"	PBI	SAF		795	JE, GM	1/1	4	0
21	"	"	SAF	LAX		796	JE, GM	1/1	2	0
23	"	"	LAX	TEB		797	JE		4	4
25	"	"	TEB	PBI		798	JE		2	3
28	"	"	PBI	CMH		799	JE, GM	1/1	2	0
28	"	"	CMH	TEB		800	~~GM~~ JE, GM		1	0
31	"	"	TEB	PBI		801	JE		2	3
							Page Total	4/4	44	2
							Amount Forward	5822/5593	6558	6
							Total to Date	5826/5597	6602	8

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000001

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
FEB 5	G1159B	N908JE	PBI	TNCM		802	JE, GM	1/1	2	4
7	G1159B	"	TNCM	TEB		803	JE, GM	1/	4	0
9	"	"	TEB	PBI		804	JE, GM, SHARON REYNOLDS		2	1
12	"	"	PBI	TEB		805	JE, GM, SHARON REYNOLDS	1/1	2	1
15	"	"	TEB	BCT		806	JIMMY CAYNE, MRS. CAYNE, ALLISON CAYNE WARREN, KARLI DEWEY, SOPHIE BIDDLE, JOY		2	4
19	"	"	BCT	TEB		807	JIMMY CAYNE, MRS. CAYNE, ALLISON CAYNE WARREN, SOPHIE, +1 PAX	1/	2	3
28	"	"	TEB	PBI		808	JE, GM, AS, SOPHIE BIDDLE		2	2
MAR 4	"	"	PBI	TEB		809	JE, GM, AS, SOPHIE BIDDLE, MARIA		2	4
8	"	"	TEB	PBI		810	JE, GM, AS, DIEDRE NEARY 1 FEMALE	1/1	2	6
11	"	"	PBI	TEB		811	JE, GM, AS, CHRISSINE, 1 FEMALE		2	3
15	"	"	TEB	PBI		812	JE, GM, AS, 1 FEMALE		2	1
18	"	"	PBI	CMH		813	JE, GM, AS, CLAIRE HAZEL, 1 FEMALE	1/1	2	1
18	"	"	CMH	TEB		814	JE, GM, AS	CONFIDENTIAL DR 000002		
22	"	"	TEB	PBI		815	JE, FRANCES, SOPHIE BIDDLE, EVA, + 4 PAX		2	3
24	"	"	PBI	TEB		816	JE, EVA, BABY, +3 PAX		2	3
26	"	"	TEB	VNY		817	JE		5	5
29	"	"	VNY	SAF		818	JE		1	5
APR 8	"	"	PBI	TEB		821	JE, GM, AS, EVA, GLENN, CELENA, NANNY		2	1
15-17	CESSNA 421B SIMULATOR		INITIAL TRAINING				INSTRUMENT COMPETENCY RIDE		10	0
							Page Total	6/4	53	8
							Amount Forward	5826/5547	6602	8
							Total to Date	5832/5551	6656	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		...and Class SEL
APR 22	G1159B	N908JE	PBI	TEB		828	JE, GM	1/1	2	2	
26	"	"	TEB	PBI		829	JE, GM, 3 PAX	1/1	2	3	
29	"	"	PBI	TEB		830	JE, GM, MASS GRAPPI 1 MALE, 2 FEMALE	1/1	2	3	
MAY 2	"	"	TEB	EIDW		831	JE, ELIZABETH JOHNSON, J. DUBKIN, C. GLENCLOAS, E. WASSELL, A. TEAL, S. TEAL, CATHERINE PIRCLAS, ELIZABETH WAMSTON	1/1	6	0	
3	"	"	EIDW	EIWF		832	A. TEAL, S. TEAL, D. TEAL	1/1		5	
3	"	"	EIWF	LFPB		833	JE, PAMELA JOHANAOFF	1/1	1	3	
6	"	"	LFPB	LSGG		834	JE, PAMELA JOHANAOFF	1/1		7	
6	"	"	LSGG	EINN		835	JE, PAMELA JOHANAOFF	1/	1	8	
6	"	"	EINN	TEB		836	JE, PAMELA JOHANANOFF		6	5	
8	"	"	TEB	MDLR		837	JE, GM, KATHERINA KOTZIG	1/1	3	3	
9	"	"	MDLR	MBGT		838	JE, GM, KATHERINA KOTZIG	1/1		7	
9	"	"	MBGT	PBI		839	JE, GM, KATHERINA KOTZIG	1/	1	5	
13	"	"	PBI	CMH		840	JE, GM, AS, 2 FEMALES	1/1	2	[illegible]	
13	"	"	CMH	TEB		841	JE, GM, AS, 1 FEMALE		1	1	
17	"	"	TEB	PBI		842	JE		2	1	
20	"	"	PBI	TEB		843	JE — JIM WEBER	1/1	2	2	
22	"	"	TEB	SAF		844	JE, GM — JIM WEBER	1/	4	0	
24	"	"	SAF	PBI		845	JE, GM — JIM WEBER	1/	3	1	
27	"	"	PBI	TEB		846	JE, GM, ANKIE		2	3	
							Page Total	14/10	46	0	2116
							Amount Forward	5832/5601	656	6	
							Total to Date	5846/5611	6702	6	211[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		...and Class SEL	MEL
MAY 30	G1159B	N908JE	TEB	PBI		847	JE		2	0		
JUN 2	"	"	PBI	TEB		848	JE, PAULA EPSTEIN, ALLISON, SIMRGG, TIFFANY	1/1	2	5		2
5	"	"	TEB	PBI		849	JE, ALLISON, CHERGG, CELENA	1/1	2	3		2
18	"	"	PBI	TEB		850	NO PASSENGERS JIM WARREN	1/1	2	2		2
19	"	"	TEB	PBI		851	JE, GM		2	1		2
24-27	"	SIMULATOR	SAV	SAV			RECURRENT TRAINING		6	0		2
JUL 9	"	N908JE	SAF	CMH		860	JE, GM	1/1	2	5		6
10	"	"	CMH	TEB		861	JE, GM, IRA ZICHERMAN	1/1	1	2		2
12	"	"	TEB	MVY		862	JE	1/1		6		1
12	"	"	MVY	TEB		863	JE			9		
12	"	"	TEB	PBI		864	JE, GM		2	4		
15	"	"	PBI	TEB		865	JE, GM	1/1	2	3		2
16	"	"	TEB	PBI		866	JE, CELINA		2			2
17	"	"	PBI	SAV		867	OPS 1 INSPECTION	1/1		9		2
AUG 3	"	"	SAV	GWR		868	OPS 1 INSPECTION	1/1	1	7		
13	"	"	PBI	TEB		873	JE, GM, ANDY, MANDY, RALPH	1/1	2	3		1
14	"	"	TEB	TVC		874	JE, GM	1/1	1	5		2
16	"	"	TVC	TEB		875	JE, GM	1/	1	4		1
18	"	"	TEB	MVY		876	JE, DAVID ROTHMAN, GHISLAIN TAYLOR 2 PAX	1/1		6		1
							Page Total	13/12	37	5		3
							Amount Forward	5846/5611	6702	6	2116	5458
							Total to Date	5859/5623	6740	1	2116	5462

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		...and Class SEL
AUG 18	G1159B	N908JE	MVY	TEB		877	JE, DAVID ROTHMAN, CELLICIA JAYLOR	1/1		9	
18	"	"	TEB	PBI		878	JE, CELINA MIDDLEFART	1/1	2	2	
21	"	"	PBI	JAN		879	JE, GM, ROBIN PLANT	1/1	1	7	
21	"	"	JAN	SAF		880	JE, GM, ROBIN PLANT	1/1	1	9	
26	"	"	SAF	PBI		881	JE, GM, ROBIN PLANT	1/1	3	3	
SEP 5	"	"	PBI	TEB		882	JE, GM	1/	2	3	
7	"	"	TEB	BED		883	JE	1/1		6	
7	"	"	BED	PVD		884	JE	1/1		3	
7	"	"	PVD	CMH		885	JE	1/1	1	5	
8	"	"	CMH	DCA		886	JE, 1 MALE, 1 FEMALE	1/1		7	
8	"	"	DCA	CMH		887	JE, JOHN GLENN, ALAN DERSHOWITZ	1/1		8	
8	"	"	CMH	TEB		888	JE, ALAN DERSHOWITZ		1	1	
9	"	"	TEB	BOS		889	ALAN DERSHOWITZ	1/1		6	
9	"	"	BOS	TEB		890	RETURN TO TEB	1/1		8	
12	"	"	TEB	PBI		891	JE, CELINA MIDDLEFART		2	3	
18	"	"	PBI	TEB		892	JE, GM	1/1	2	3	
20	"	"	TEB	PBI		893	JE, GM	1/1	2	1	
23	"	"	PBI	BED		894	JE, GM	1/1	2	6	
23	"	"	BED	TEB		895	JE, GM			6	
							Page Total	16/15	28	6	
							Amount Forward	5859/5623	6740	1	2116
							Total to Date	5875/5638	6768	7	2116

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
SEP 26	G1159B	N908JE	TEB	CMH		896	JE	1/1	1	2
26	"	"	CMH	PBI		897	JE		1	9
OCT 6	"	"	PBI	TEB		901	JE, GM, DIDIER	1/1	2	4
10	"	"	TEB	PBI		902	JE		2	5
14	"	"	PBI	TEB		903	JE, 1 FEMALE	1/1	2	4
15	"	"	TEB	CMH		904	TO CMH FOR PICK-UP	1/1	1	2
15	"	"	CMH	TEB		905	JE, DARREN, IRB ZICKERMAN, JEFF SCHANTZ	~~1/1~~	1	2
19	"	"	TEB	PBI		906	JE, DIDIER AZABUMEC	1/1	2	3
22	"	"	PBI	TEB		907	JE, GM, DIDIER CAZABUDUMEC	1/1	2	3
24	"	"	TEB	SAF		908	JE, GM, LARRY		4	1
25	"	"	SAF	PBI		909	JE, GM, SHANNON	1/1	3	[illegible]
27	"	"	PBI	TEB		910	JE, GM, JOE PASBCOW, SHARON	1/1	2	4
30	"	"	TEB	DCA		911	JE, ANDY STEWART, LESLIE GELB, BRIAN MATHES, LESTER POLLACK, STEPHEN RUBIN	1/1		6
30	"	"	DCA	TEB		912	JE, ANDY STEWART, LESLIE GELB, 3 PAX	1/1		6
31	"	"	TEB	PBI		913	JE, GM, DIDIER CAZABUDUMEC		2	2
NOV 4	"	"	PBI	TEB		914	JE, GM, DIDIER CAZABUDUMEC	1/1	2	5
7	"	"	TEB	PBI		915	JE, SOPHIE, JEFF SCHANTZ FAMILY (4) EVA, GLENN, CHILD, MANNY, LAVALLE, ICELAND		2	2
11	"	"	PBI	TEB		916	JE, SOPHIE, SERIGNO, JEFF SCHANTZ, CAMILLO, EVA, CHILD, MANNY, NADIA, RUSS KIPPES		2	2
15	"	"	TEB	CMH		917	JE, GM, JEFF SCHANTZ, DARREN, RUSS KIPPES		1	3

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Aircraft Category	
Page Total	11/9	38	7
Amount Forward	5875 / 5638	6768	7
Total to Date	5886 / 5647	6807	4

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE			...and Cla SEL
NOV 15	G1159B	N908JE	CMH	PBI		918	JE, GM, CLAIR, RUSS KIPPES		2	1		
17	"	"	PBI	BED		919	JE, GM, EVA & GLENN DUBIN, BABY, NANNY	1/	2	6		
17	"	"	BED	TEB		920	GM, EVA & GLENN DUBIN, BABY, NANNY			6		
21	"	"	TEB	PBI		921	GM, JE, DIDIER CAZAUDUMEC, 2 AUNTS, DAVID ROTH, 2 EGMOLES		2	2		
28	"	"	PBI	LZU		922	JE, GM, 2 AUNTS, PAULA EPSTEIN	1/1	1	3		
28	"	"	LZU	PBI		923	JE, GM	1/1	1	2		
30	"	"	PBI	ABY		924	JE, GM	1/1	1	1		
30	"	"	ABY	LZU		925	JE, GM			5		
30	"	"	LZU	PBI		926	JE, GM, 2 AUNTS, PAULA EPSTEIN, MARK & KAREN EPSTEIN		1	3		
DEC 2	"	"	PBI	TEB		927	JE, GM, MARK & KAREN EPSTEIN, 2 AUNTS, KEARLEY(?), GANA, BABY, GWENDOLYN BECK, JDG, ART PAS, (?)	1/	2	3		
4	"	"	TEB	PBI		928	JE, DIDIER CAZAUDUMEC, GWENDOLYN BECK	1/	2	3		
9	"	"	PBI	FTK		929	JE, GM, DIDIER CAZAUMEC	1/	2	1		
9	"	"	FTK	TEB		930	JE, GM, DIDIER, NATHAN MYHRVOLD, BRAN	1/	1	6		
12	"	"	TEB	PBI		931	JE, JIMMY CAYNE, PAT CAYNE, EVA DUBIN, GLENN DUBIN, EVA'S NANNY		2	2		
20	"	"	PBI	TIST		932	JE, GM, GWENDOLYN BECK, RUBEN PLANT	1/1	2	3		
23	"	"	TIST	PBI		933	JE, GM, GWENDOLYN BECK, RUBEN PLANT	1/1	2	4		
1997 JAN 5	"	"	PBI	EWR		934	JE, GM, DONALD TRUMP, MARK EPSTEIN, EVA, GLENN, CELINA DUBIN, DIDIER	1/	3	1		
11	"	"	EWR	TIX		935	JE, NATHAN MYHRVOLD, ALAN DERSHOWITZ, CELINA MIDELFART, (?)	1/1	2	3		
11	"	"	TIX	PBI		936	NO PASSENGERS - RETURN WITH 421	1/1		4		

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	AIRPLANE			SEL
Page Total	13/9	33	9		
Amount Forward	5886 / 5647	6807	4		2116
Total to Date	5899 / 5655	6841	3		211[illegible]

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... ADJ3LOW	
JAN 21	G II B	N908JE	PBI	TEB		937	JE, GM, KAREN		2	2
24	"	"	TEB	TNCM		938	JE, GM, CLAIRE HAZEL, AMANDA	1/1	3	4
25	"	"	TNCM	PBI		939	JE, GM, CLAIRE HAZEL, AMANDA	1/1	2	8
29	"	"	PBI	TEB		940	JE, GM, GWENDOLYN BECK	1/1	2	1
30	"	"	TEB	PBI		941	JE, CELENA MIDDELFART, ANTHONY BARRETT, GWENDOLYN BECK, [illegible]		2	4
FEB 2	"	"	PBI	TEB		942	JE, CELENA MIDDELFART, ANTHONY, DONNA, GABRIELLA [illegible], JOEL [illegible]		2	2
2	"	"	TEB	SAV		943	TO SAV FOR GEAR CHANGE, GLAP TABLE CORRECTION, RUDDER ACTUATOR	[illegible]	1	7
13	"	"	SAV	TEB		944	NO PASSENGERS	1/1	1	5
13	"	"	TEB	PBI		945	JE, GM, SOPHIE [illegible], ROBIN [illegible], ANSON, EVA, CELENA [illegible]		2	5
17	"	"	PBI	TEB		946	JE, GM, GLEN, EVA, CELENA, ROBIN, LYNN, BEN FORESTER	1/	2	2
21	"	"	TEB	PBI		947	JE, CELENA MIDDELFART, ALLISON		2	7
23	"	"	PBI	TEB		948	JE, CELENA, JOJO, LYN, 2 KIDS [illegible], BOB, ALLISON, SOPHIE, LARRY KERNEY	1/	2	2
25	"	"	TEB	PBI		949	JE, GM, DONNA, [illegible]		2	2
MAR 1	"	"	PBI	SAF		950	JE, GM	1/1	3	6
2	"	"	SAF	SJC		951	JE, GM	1/	2	2
3	"	"	SJC	TEB		952	JE, GM	/1	4	3
8	"	"	TEB	PBI		953	JE, GM, CLAIRE HAZEL		2	2
10	"	"	PBI	CMH		954	JE, CLAIRE HAZEL	1/1	2	0
10	"	"	CMH	VNC		955	JE, PAMELA STEVENS	1/	2	0
							Page Total	16/7	45	9
							Amount Forward	5899 / 5655	6841	3
							Total to Date	5909 / 5662	6887	2

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000008

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAR 10	G1159B	N908JE	VNC	PBI		956	JE			4
15	"	"	PBI	DCA		957	JE, CELINA MIDELFART	1/1	1	7
15	"	"	DCA	IAD		958	REPOSITION FOR CUREW			2
15	"	"	IAD	PBI		959	JE, CELINA MIDELFART		2	0
24	"	"	PBI	TEB		960	JE, GM, SUZANNA, JOEL PASHCOW, 1 FEMALE	1/1	2	3
27	"	"	TEB	PBI		961	JE, GM, DIDIER CAZAUDUMEC		2	1
30	"	"	PBI	SAF		962	JE, GM, DIDIER CAZAUDUMEC		3	7
APR 2	"	"	SAF	CMH		963	JE, GM, DC	1/1	2	4
2	"	"	CMH	TEB		964	JE, GM, DC		1	1
10	"	"	TEB	PBI		965	JE, DC, DONNA, 2 FEMALES, 1 MALE		2	2
15	"	"	PBI	DCA		966	JE, GM, DC, MANDY, GWENDOLYN BECK, DEEDRE, KATHERINE	1/1	2	0
15	"	"	DCA	TEB		967	JE, DC, GWENDOLYN BECK, LYNN			7
17	"	"	TEB	PBI		968	JE, GM, DC, EVA, GLENN, CELINA, [illegible], 1 FEMALE, MANDY, 2 NANNYS, GWENDOLYN BECK, FELECIA TAYLOR,	1/1	2	4
21	"	"	PBI	TEB		969	JE, DC, MANDY, LISA, 1 MALE	1/1	2	2
21	"	"	TEB	BED		970	JE	1/1		5
21	"	"	BED	TEB		971	JE			7
22	"	"	TEB	PBI		972	JE		2	3
27	"	"	PBI	TEB		973	JE, CELINA MIDELFART	1/1	2	4
MAY 2	"	"	TEB	EGGW		974	JE, GM	1/1	6	5
							Page Total	9/9	37	8
							Amount Forward	5909 / 5662	6887	2
							Total to Date	5918 / 5671	6925	0

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

211

2111

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAY 5	G1159B	N908JE	EGGW	LSGG		975	JE	1/1	1	3
5	"	"	LSGG	LFPB		976	JE	1/1		7
6	"	"	LFPB	CYJT		977	JE, GM	1/1	5	6
6	"	"	CYJT	TEB		978	JE, GM	1/1	2	2
9	"	"	TEB	SAF		979	JE, GM, NADIA		3	9
12	"	"	SAF	VNY		980	JE	1/	1	5
14	"	"	VNY	SAF		981	JE, SOPHIE BIDDLE	1/1	1	5
15	"	"	SAF	DFW		982	JE, GM, SOPHIE BIDDLE, JACK ROBERTSON	1/1	1	2
15	"	"	DFW	PBI		983	JE, SOPHIE BIDDLE	1/1	2	0
23	"	"	PBI	JFK		984	REPOSITION TO JFK		2	2
24	"	"	JFK	PBI		985	JE, CELINA MIDELFART, GINGER SOUTHGATE	1/	[illegible]	[illegible]
JUN 1	"	"	PBI	TEB		986	JE, MANDY	1/1	2	1
5	"	"	TEB	PBI		987	JE, GM, DIDIER		2	4
9	"	"	PBI	TEB		988	JE, GM	1/1	2	3
21	"	"	TEB	MVY		989	JE, LYNN FORESTER, HEATHER MANN, RUSS KIPPES	1/1		6
21	"	"	MVY	PBI		990	JE, HEATHER MANN RUSS KIPPES		2	4
23	"	"	PBI	CMH		991	JE, HEATHER RUSS KIPPES	1/1	2	1
23	"	"	CMH	TEB		992	JE, RUSS KIPPES		1	1
27	"	"	TEB	PBI		993	JE, GM RUSS KIPPES		2	1
							Page Total	13/13	39	3
							Amount Forward	5918 / 5671	6925	0
							Total to Date	5931 / 5684	6964	3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

...and
SEL
2116
211

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	...and Class SEL
JUL 1	G1159B	N908JE	PBI	TEB		994	JE, GM, PAULA EPSTEIN	1/1	2 5	
10	"	"	CMH	SAF		999	JE, DIDIER	1/1	3 0	
16	"	"	PBI SAF	PBI		1000	JE, GM, DIDIER CAZAUBONGE		3 2	
22	"	SIMULATOR	DFW	HOU			SIMULATOR - STEEP TURNS, VSO, VS1, JET UPSET (WAKE TURBULENCE)		3 0	
23	"	"	TEB	HPN			WINTER OPERATIONS, ELECTRICAL, SINGLE ENGINE, RTO		3 0	
24	"	"	DFW	COS			HIGH ALTITUDE, HYDRAULICS, EMERGENCY DESCENT, WINDSHEAR		3 0	
13	C-421B	N908GM	ZOR-SAF	ZOR		57	4 TAKE OFF + LANDING	4/4	7	
15	"	"	ZOR	SAF		58		1/1	2	
AUG 1	"	"	SAF	ZOR		59	KRISTY RODGERS	1/1	4	
9	G1159B	N908JE	PBI	TVC		1012	JE, GM	1/1	2 7	
10	"	"	TVC	TEB		1013	JE, GM	1/1	1 5	
13	"	"	TEB	PBI		1014	JE, GM		2 3	
17	"	"	PBI	MVY		1015	JE, HEATHER MANN	1/1	2 5	
17	"	"	MVY	TEB		1016	JE, HEATHER MANN	1/1	7	
20	"	"	TEB	SAF		1017	JE, CELINA, GLEN, EVA, CELINA MIDELFART, DIDIER		3 9	
23	"	"	SAF	TEB		1018	JE, CELINA MIDELFART, DIDIER, GLENN, EVA + CELINA DUBIN	1/	3 5	
24	"	"	TEB	FOK		1019	REPOSITION	1/1	5	
24	"	"	FOK	MVY		1020	JE, CELINA MIDELFART		4	
25	"	"	MVY	PBI		1021	JE, CELINA MIDELFART	1/1	2 6	
							Page Total	15/14	39 6	
							Amount Forward	5931 / 5684	6964 3	2116 5
							Total to Date	5946 / 5698	7003 9	2116 5

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1997 SEP	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		...and Class SEL
1	GII59B	N908JE	PBI	TEB		1022	JE, HEATHER MANN	1/1	2	6	
2	"	"	TEB	CMH		1023	REPOSITION	1/1	1	2	
3	"	"	CMH	TEB		1024	STEVE & JUDY TUCKERMAN	1/1	1	2	
3	"	"	TEB	LFPB		1025	JE, JACK ROBERTSON, STEVE & JUDY TUCKERMAN, YEHUDA & ZIPORA KOPPEL	[illegible]/1	6	6	
6	"	"	LFPB	LFMN		1026	JE, GM, JOAN & ANNIE GLENN, MARTY TREUST, FLIGHT ATTENDANT GERRY BEAR, STAFF	1/1	1	3	
7	"	"	LFMN	EGGW		1027	JE, GM	1/	1	6	
12	"	"	EGGW	CYJT		1028	JE, GM		5	5	
13	"	"	CYJT	PBI		1029	JE, GM		4	3	
15	"	"	PBI	TEB		1030	JE, GM	1/	2	3	
19	"	"	TEB	CMH		1031	JE, HEATHER MANN, DIDIER	1/1	1	2	
20	"	"	CMH	PBI		1032	JE, HEATHER MANN, DIDIER				
22	"	"	PBI	SAF		1033	JE, GM, DIDIER, CLAIRE HAZEL	1/1	3	6	
26	"	"	SAF	TEB		1034	JE, GM, DIDIER, DOUG SHUELLE, AUGUSTO PINTO, JACK ROBERTSON, PASCAL	1/	3	5	
28	"	"	TEB	PBI		1035	JE, GABRIELLE		2	4	
18	GIII	N883A	SAV	SAV			TEST FLIGHT FOR NATHAN MYHRVOLD, STALLS, ALL SYSTEMS CHECKED	1/1	2	0	
26	CESSNA 421	N908GM	ZOR-SAF-ABQ-ABQ-ZOR				CFI REVALIDATION RIDE, ILS APPROACH, ADF APPROACH	4/4	1	9	
OCT 4	GII59B	N908JE	PBI	STL		1036	REPOSITION	1/1	2	2	
4	"	"	STL	PBI		1037	JE, GM		2	2	
12	"	"	PBI	TEB		1038	JE, HEATHER MANN	1/	2	9	
							Page Total	16/13	50	4	
							Amount Forward	5946 / 5698	7003	9	2116
							Total to Date	5962 / 5711	7054	3	2116

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19 97	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
OCT 17	G1159B	N908JE	TEB	PBI		1039	JE, GM, CLAIRE, EMMY, DIDIER, 1 FEMALE		2	5
21	"	"	PBI	TEB		1040	JE, GM, MANDY, EMMY, DIDIER	1/	2	2
~~JUL 13~~	~~CESSNA 421~~	~~N908GM~~	~~ZORRO~~	~~SAF~~		~~37~~	~~CURRENCY REQUIREMENT~~	4/4		
24	"	"	TEB	BED		1041	JE, EMMY	1/1		7
24	"	"	BED	PBI		1042	JE, EMMY	1/1	2	6
27	"	"	PBI	TEB		1043	JE, GM, EMMY TAYLER	1/1	2	1
31	"	"	TEB	PBI		1044	JE, GM, ET, (GLEN, EVA, CELINA, JORDAN DUBIN) + NANNY	1/1	2	4
NOV 2	"	"	PBI	SAF		1045	JE, GM, ET, 1 FEMALE		3	8
4	"	"	SAF	TEB		1046	JE, GM, ET, GARY + MARY KERNEY	1/	3	4
7	"	"	TEB	JAX		1047	JE, LYNN FORESTER	1/1	1	9
7	"	"	JAX	PBI		1048	JE	1/1		7
8	C-421	N908GM	PBI	MIA		70	LARRY VISOSKI	1/		
24	G1159B	N908JE	PBI	TEB		1049	REPOSITION TO TEB	1/1	2	3
24	"	"	TEB	SAF		1050	JE, ET	1/1	3	9
25	"	"	SAF	PBI		1051	JE, ET	1/	3	0
29	"	"	PBI	TEB		1052	JE, DIDIER, CELINA MIDELFART, JOE PAGANO, GENE		2	2
DEC 6	"	"	TEB	PBI		1053	JE, GM, ET		2	2
9	"	"	PBI	TEB		1054	JE, GM, ET	1/1	2	2
11	"	"	TEB	PBI		1055	JE, EVA, CELINA, JORDAN DUBIN + NANNY		2	5
							Page Total	13 / 10	41	0
							Amount Forward	5962 / 5711	7054	3
							Total to Date	5975 / 5721	7095	3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1997 DEC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE				
14	G1159B	N908JE	PBI	TEB		1056	JE, GLEN, EVA, CELINA, JORDAN DUBIN, NANNY, 2 FEMALES	1/1	2	1			
17	"	"	TEB	BCT		1057	JE, MANDY ELLISON, GWENDOLYN BECK, WARREN SPECTOR, JIMMY + MRS CAYNE, ET		2	5			
17	"	"	BCT	PBI		1058	JE, MANDY ELLISON, GWENDOLYN BECK, EMMY TAYLOR			1			
1998 JAN 3	"	"	PBI	TEB		1059	JE, GM, ET, GLEN DUBIN, JIMMY + MRS CAYNE, WARREN WHEETET, MARGARET WHEETET		2	3			
8	"	"	TEB	SAF		1060	JE, GM, ET, DOUG SCHOETTLE	1/	3	8			
10	"	"	SAF	PBI		1061	JE, GM, ET, DOUG SCHOETTLE	1/	2	7			
13	"	"	PBI	TEB		1062	JE, GM, ET	1/1	2	3			
18	"	"	TEB	PBI		1063	JE, ET, 1 FEMALE		2	4			
20	"	"	PBI	TIST		1064	JE, GM, ET, GWENDOLYN BECK, SHARON	1/	2	0			
25	"	"	TIST	TNCM		1065	JE, GM, ET, MELINDA LUNTZ, SHARON CRAPE	1/1		4			
25	"	"	TNCM	TEB		1066	JE, GM, ET, ML, SC	1/	4	2			
30	"	"	TEB	PBI		1067	JE	1/1	2	3			
31	"	"	PBI	JAX		1068	JE	1/1		8			
31	"	"	JAX	APF		1069	JE, ELLEN SPENCER	1/1		8			
31	"	"	APF	PBI		1070	JE, ELLEN SPENCER	1/1		4			
FEB 2	"	"	PBI	TEB		1071	JE, SOPHIE BIDDLE		2	2			
6	"	"	TEB	PBI		1072	JE, GM, ET, SOPHIE BIDDLE, EVA, GLEN, JORDAN, CELINA DUBIN	1/1	2	6			
9	"	"	PBI	TEB		1073	JE, GM, ET, CLAIRE HAZEL, JOEL PASHCOW, LEEMAN, ALAN DERSHOWITZ, MANDY, 3 DUBINS +1	1/	2	4			
12	"	"	TEB	PBI		1074	JE, GM, JOEL PASHCOW, LAUREN PASHCOW, ET, JIM + MRS CAYNE, WARREN SPECTOR	1/	2	6			
							Page Total	14 / 8	38	9			
							Amount Forward	5975 / 5721	7095	3			
							Total to Date	5989 / 5729	7134	2			

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
DEC 14	G1159B	N908JE	PBI	TEB		1056	JE, GLEN, EVA, CELINA, JORDAN DUBIN, NANNY, 2 FEMALES	1/1	2	1
17	"	"	TEB	BCT		1057	JE, MANDY ELLISON, GWENDOLYN BECK, WARREN SPECTOR, JIMMY + MRS COYNE, ET		2	5
17	"	"	BCT	PBI		1058	JE, MANDY ELLISON, GWENDOLYN BECK, EMMY TAYLOR			1
1998 JAN 3	"	"	PBI	TEB		1059	JE, GM, ET, GLEN DUBIN, JIMMY + MRS COYNE, WARREN WEXLER, MARGARET WEXLER		2	3
8	"	"	TEB	SAF		1060	JE, GM, ET, DOUG SCHOETTLE	1/	3	8
10	"	"	SAF	PBI		1061	JE, GM, ET, DOUG SCHOETTLE	1/	2	7
13	"	"	PBI	TEB		1062	JE, GM, ET	1/1	2	3
18	"	"	TEB	PBI		1063	JE, ET, 1 FEMALE		2	4
20	"	"	PBI	TIST		1064	JE, GM, ET, GWENDOLYN BECK, SHERRI	1/	2	0
25	"	"	TIST	TNCM		1065	JE, GM, ET, MELINDA LUNTZ, SHERRI CRAPO	1/1		4
25	"	"	TNCM	TEB		1066	JE, GM, ET, ML, SC	1/	4	2
30	"	"	TEB	PBI		1067	JE	1/1	2	3
31	"	"	PBI	JAX		1068	JE	1/1		8
31	"	"	JAX	APF		1069	JE, ELLEN SPENCER	1/1		8
31	"	"	APF	PBI		1070	JE, ELLEN SPENCER	1/1		4
FEB 2	"	"	PBI	TEB		1071	JE, SOPHIE BIDDLE		2	2
6	"	"	TEB	PBI		1072	JE, GM, ET, SOPHIE BIDDLE, EVA, GLEN, JORDAN, CELINA DUBIN	1/1	2	6
9	"	"	PBI	TEB		1073	JE, GM, ET, CLAIRE HAZEL, JOEL PASHCOW, 1 FEMALE, ALAN DERSHOWITZ, MANDY, 3 DUBINS +1	1/	2	4
12	"	"	TEB	PBI		1074	JE, GM, JOEL PASHCOW, LAUREN PASHCOW, ET, JIM + MRS COYNE, WARREN SPECTOR	1/	2	6
							Page Total	14 / 8	38	9
							Amount Forward	5415 / 5721	7095	3
							Total to Date	5489 / 5729	7134	2

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000015

Date 1998 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE
1	C172	N75RR	LNA-F45	LNA			CHECK OUT IN CESSNA 172	5/5	8
7	C172	N75RR	LNA-X10	PBI-LNA			CHRIS WAGNER, HOOD SDL, CONSTANT AIRSPEED CLIMBS, TURNS TO A HEADING, UNUSUAL ATTITUDE	3/3	2 0
14	G1159B	N908JE	PBI	SAF		1075	JE, GM, ET	1/1	3 9
15	"	"	SAF	LAS		1076	JE	1/1	1 3
15	"	"	LAS	VNY		1077	JE	1/1	7
18	"	"	VNY	MRY		1078	JE, BOB, KET, 3 FEMALE, 1 MALE		8
21	"	"	MRY	SAF		1079	JE		1 5
22	"	"	SAF	TEB		1080	JE, GM, ET	1/	3 3
27	"	"	TEB	DCA		1081	JE, ET, GWENDOLYN BECK	1/1	6
~~27~~	~~"~~	~~"~~	~~DCA~~	~~TIST~~		1082	~~JE, GWENDOLYN BECK~~		3 2
28	"	"	TIST	PBI		1083	JE, GM, ET, GB, GARY KERNEY	1/1	2 7
MAR 4	C421	N70BGM	PBI	AVO	CHRIS WAGNER		RADIO COMMUNICATIONS, FSS, PILOTAGE FLIGHT PLANS, VOR NAVIGATION RADAR	1/1	7
4	C421	"	AVO	LEE			CHRIS WAGNER, CLASS B, CIVILIAN NAV VOR/NAVAIDS, ADF BEARINGS	1/1	7
4	"	"	LEE	PBI			RADAR SERVICES, ARTCC, CLASS B CLEARANCE CHRIS WAGNER – XC OVER 100 NM		1 6
11	"	"	PBI	AVO			CHRIS WAGNER – HOOD TIME, PILOTAGE, RADIO	1/1	8
11	"	"	AVO	PBI			CHRIS WAGNER – VOR NAVIGATION, CONTROLLED AIRPORT OPERATIONS	1/1	8
12	"	"	PBI	EYW			CHRIS WAGNER – RADIO PROCEDURES, PILOTAGE, TODD LUCKEY +1	1/1	1 1
12	"	"	EYW	PBI			CHRIS WAGNER – VOR, NIGHT OPS .5 ACTUAL		1 0
20	G1159B	N908JE	PBI	PBI		1084	TEST FLIGHT AFTER OPS	1/1	4
							Page Total	20 / 19	27 3
							Amount Forward	5989 / 5729	7134 2
							Total to Date	6009 / 5748	7161 5

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 1998	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAR 23	G1159B	N908JE	PBI	TEB		1085	JE, GM, EVA ANDERSSON, CELINA, JORDAN DUBIN, NANNY, 1 MALE	1/1	2	2
25	"	"	TEB	SAF		1086	JE, GM, ET		4	4
27	"	"	SAF	PBI		1087	JE, GM, DOUG SHOETTLE, ET	1/0	2	9
31	C172	N51898	LNA	LNA			CHECK OUT IN CESSNA 172	3/3		8
31	"	"	LNA-PBI-LNA				CHRIS WAGNER - 3 EMERGENCY LANDINGS, NIGHT REQUIREMENTS		1	3
16	C421	SIMULATOR					RECURRENT TRAINING AT SIMCOM			
17	"	"					EMERGENCY PROCEDURES			
13	"	"					INSTRUMENT COMPETANCY CHECK			
APR 5	G1159B	N908JE	PBI	TEB		1088	JE, HEATHER MITCHELL, BABY MITCHELL, 1 FEMALE, MELINDA LUNTZ	1/1	2	5
6	"	"	TEB	W47		1089	JE, 2 FEMALES (ROXEBY FARMS)	1/1		7
6	"	"	W47	RIC		1090	JE, PAUL MELLON, 2 FEMALES CAROLYN	1/1		5
6	"	"	RIC	W47		1091	JE, PAUL MELLON, 2 FEMALES	1/1		4
6	"	"	W47	TEB		1092	JE, 2 FEMALES	1/1		7
9	"	"	TEB	BED		1093	JE, OLIVER SACHS	1/1		6
9	"	"	BED	TEB		1094	JE, OLIVER SACHS, ROBIN			9
9	"	"	TEB	PBI		1095	JE, GM, GLEN, EVA, CELINA, JORDAN, DUBIN, JEFF SCHANTZ, WIFE, 2 KIDS		2	3
11	C172	N75RR	LNA-FXE-LNA			~~1096~~	CHRIS WAGNER - RADIO, VOR, CONTROLLED AIRPORT, EMERGENCY PROCEDURES	2/2	1	2
16	G1159B	N908JE	MBUN	MYNN		1096	JE (MET PRINCESS SARAH FERGUSON + KIDS ON THE GROUND)	1/1		6
16	"	"	MYNN	PBI		1097	JE	1/1		6
							Page Total	15 / 14	22	6
							Amount Forward	6009 / 5748	7161	5
							Total to Date	6024 / 5762	7184	1

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000017

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Date 1998	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE			
APR												
17	G1159B	N908JE	PBI	PBI		1098	CERTIFICATION FOR GPS APPROACHES	1/1	1	6		
17	C421	N908GM	PBI	X21			CHRIS WAGNER - PATSY, KRISTY, LAURIE UNCONTROLLED AIRPORT OPERATIONS	1/1		9		
17	C421	"	X21	TIX			SAME AS ABOVE	1/		1		
17	"	"	TIX	CRG			KRISTY RODGERS, PATSY S+L, CLIMBS, DESCENTS, TURNS	1/		6		
18	"	"	CRG	LAL			PATSY RODGERS, KRISTY S+L, CLIMBS, DESCENTS, TURNS	1/		8		
18	"	"	LAL	PBI			CHRIS WAGNER, LAURIE, KRISTY, PATSY VOR, PELORAGE, RADIALS, RADIOS COMM.	1/1	1	1		
19	G1159B	N908JE	PBI	CMH		1099	JE, CLAIR HAZEL, 1 FEMALE	1/1	2	0		
20	"	"	CMH	LUK		1100	JE, GINGER, MANDY LANE	1/1		3		
20	"	"	LUK	TEB		1101	JE, GINGER, MANDY LANE	1/1	1	2		
24	"	"	TEB	PBI		1102	JE, GM, COCO BROWN, ET, LINDA	1/1	2	2		
25	C172	N75RR	LNA-PBI-LNA				CHRIS WAGNER - NO FLAP APPROACHES EMERGENCY PROCEDURES - CLASS C	4/4	1	0		
25	"	"	LNA	LNA			SHORT, SOFT, REJECTED TAKEOFF, EMERGENCY LANDINGS - CHRIS WAGNER	6/6		8		
26	"	"	LNA-PBI-LNA				TRAFFIC PATTERN, EMERGENCY LANDINGS, CLASS C OPERATIONS	5/5		9		
26	G1159B	N908JE	PBI	TEB		1103	JE, GM, ET	1/	2	3		
MAY	"	"	TEB	PBI		1104	JE, GM, ET, GLEN DUBIN, JORDAN, CELINA, NANNY	1/1	2	5		
1	C172	N75RR	LNA-PBI-LNA	CLASS WAIVER			SHORT & SOFT FIELD, T.G., EMERGENCY LANDINGS, TAS, CLASS C OPERATIONS	11/11	1	5		
3	G1159B	N908JE	PBI	TEB		1105	JE, GM, ET, NADIA, GLENN, EVA, CELINA, JOHNNY, NANNY, ENNOBLEMENT	1/	2	3		
5	"	"	TEB	BED		1106	JE, ROBIN	1/1		6		
5	"	"	BED	TEB		1107	JE, ROBIN, STEVEN			7		
							Page Total	46/38	22	8		
							Amount Forward	6024/5762	7184	1		
							Total to Date	6064	7206	9		

I certify that the statements made by me on this form are true

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000018

Date 19 99	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAY 7	G1159B	N908JE	TEB	PBI		1108	JE, ET		2	3
9	"	"	PBI	TIST		1109	JE, ET, SHERRIE, CLAIR HAZEL	1	2	0
11	"	"	TIST	TEB		1110	JE, GM, ET, CLAIRE HAZEL, CHRIS KNAKE	1	3	7
15	"	"	TEB	PBI		1111	JE, MANDY ELLISON	1	2	0
17	"	"	PBI	TEB		1112	JE	1	2	4
18	"	"	TEB	MDW		1113	GM, ET, SHANNON HEALY, ALBERTO PINTO, 1 MALE	1	1	6
18	"	"	MDW	SAF		1114	GM, ET, JE, SHANNON, ALBERTO, 1 MALE		2	5
20	"	"	SAF	LAX		1115	JE, GM, ET, ALBERTO, PASCAL, 1 MALE	1	1	7
20	"	"	LAX	TEB		1116	GM, ET, ALBERTO, 1 MALE	1	4	5
JUN 4	"	"	TEB	PBI		1117	JE, MANDY ELLISON, 1 FEMALE	1	2	2
8	"	"	PBI	TEB		1118	JE, GWENDOLYN BECK, 1 FEMALE	1	2	5
12	"	"	TEB	TIST		1119	JE, GM, ET, CLAIRE HAZEL, MELANIE STAVINIES	1	3	0
15	"	"	TIST	JFK		1120	JE, GM, ET, CLAIRE HAZEL, MELANIE STAVINIES	1	4	3
18	"	"	JFK	PBI		1121	JE, GM, LYNN FONTANILLA, CRAIG ADAMS		2	0
21	"	"	PBI	TEB		1122	JE, RALPH ELLISON, LYNN FONTANILLA, GARY ROXBURGH	1	2	5
23	"	"	TEB	BED		1123	JE, GARY ROXBURGH	1		7
23	"	"	BED	TEB		1124	JE, HENRY ROSOVSKY, GARY ROXBURGH	1	1	2
26	"	"	TEB	PBI		1125	JE, GM, MELINDA LUNTZ, GARY ROXBURGH	1	2	6
TOTAL AT BOTTOM OF PAGE REPORTED TO INSURANCE COMPANY										
							Page Total	15 / 9	43	7
							Amount Forward	6064 / 5900	7206	9
							Total to Date	6079 / [illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000019

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Date 19 18	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
JUL										
5	G1159B	N908JE	PBI	OXC		1126	JE	1/1	2	5
5	"	"	OXC	TEB		1127	JE	1/1		4
10	"	"	TEB	PBI		1128	JE, SOPHIE BIDDLE, 2 FEMALES	1/1	2	3
12	C150	49563	JVY	JVY		•	C150 CHECK OUT DAN-CFI JOHNSON	2/2		6
12	"	N778ME	JVY	JVY		1	JONATHAN MAND - PREFLIGHT, CHECKLIST, ENGINE START, MIXTURE CONTROL, S-TURNS	2/2	1	4
13	"	"	"	"		2	ARROW, TRAFFIC PATTERNS, CLIMBS, TURNS, MCA, FORWARD & SIDE SLIP, DESCENTS (2)	3/3	1	1
13	"	"	"	"			EMERGENCY LANDINGS, NORMAL TAKEOFFS	2/2		5
16	"	"	"	"		3,4	JONATHAN MAND, Vy, Vx, STEEP TURNS, MCA [illegible], FORWARD SLIP, T&L, BASIC RADIO PROCEDURES	4/4	1	0
16	"	"	"	"		5	JONATHAN MAND, CLIMBING TURNS, DEPARTURE AND ENTRY OF TRAFFIC PATTERN, ALL STALLS, CFIT, ATS,	3/3		9
17	"	"	"	"		6	GO AROUND, TRIM, BASIC RADIO PROCEDURES, TRIM, S-TURNS, TAP, MCA, ENGINE FAILURE	2/2	1	1
17	"	N45563	JVY	BQM		7	VOR TRACKING, (STALLS - POWER ON, OFF, BANK, MCA, CONTROL TOWER OPERATIONS	2/2		8
17	"	"	BQM	JVY			ATIS, GROUND CONTROL, NORMAL TAKE-OFF & LANDINGS, RADIO PROCEDURES	4/4		8
17	"	N778ME	JVY	JVY		8	FLIGHT AT VARIOUS AIRSPEEDS FROM CRUISE TO SLOW FLIGHT, FULL STALLS, STALLS FROM VARIOUS ATTITUDE AND DEVICE CONFIGURATION	5/5	1	2
17	"	"	"	"			CROSSWIND TAKE-OFF + LANDINGS, DESCENTS USING HIGH & LOW DRAG CONFIGURATION, RTO	9/9		8
18	"	"	JVY (Lot)	IMS		19	CHECKPOINTS, FAA FLIGHT PLAN ACTIVATION, PILOTAGE, DEAD RECKONING, ALTERNATE AIRPORT	1/1	1	4
18	"	"	IMS	JVY		19	Vx, VOR TRACKING, VOR PASSAGE, VOR RADIALS, LEVEL OFF IN DESCENT, CROSSWIND LANDING	1/1		4
28	G1159B	SIMULATOR	IRW	IRW			RTO, STEEP TURNS, ALL STALLS, RECOVERY [illegible], NO ENGINES LANDING, ILS, SINGLE ENGINE ILS, NDB		2	1
29	"	"	HUB	HOU		-	JET UPSET, WAKE TURBULENCE, DOUBLE ENGINE FAILURE, SINGLE ENGINE GO AROUND, HOLDING		1	8
30	"	"	CYS	COS			WINDSHEAR, HOT-HIGH ALTITUDE OPERATIONS, CIRCLING APPROACH, VOR, EMERGENCY DESCENT, HYDRAULIC PROBLEMS, NDB/DME ARC, APPROACH		2	1
							Page Total	43/43	23	2
							Amount Forward	6079 / 5809	1250	6
							Total to Date	6122 / [illegible]	7273	8

I certify that the statements made by me on this form are true.

Pilot's Signature: David Dodd

Date 19 98	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER
AUG										
3	G1159B	N908JE	PBI	TEB		1136	JE, GM, ADAM, EMMY, RON	1/1	2.5	
4	"	"	TEB	HTO		1137	JE, MELANIE STARUCS	1/1	.7	
4	"	"	HTO	OQU		1138	NO PASSENGERS	1/1	.5	
4	"	"	OQU	TEB		1139	JE	1/1	1.1	
5	"	"	TEB	BED		1140	JE	1/1	.8	
5	"	"	BED	MVY		1141	JE	1/1	.5	
5	"	"	MVY	TEB		1142	JE	1/1	1.0	
6	"	"	TEB	CMH		1143	JE	1/1	1.3	
6	"	"	CMH	TEB		1144	JE	1/1	1.3	
7	"	"	TEB	TVC		1145	JE, GM, ET, MELINDA LUNTZ		1.8	
11	"	"	TVC	TEB		1146	JE, GM, ET	1/1	1.5	
13	"	"	TEB	PBI		1147	JE, GM, ET, PAULA EPSTEIN		2.4	
17	"	"	PBI	TEB		1148	JE, GM, ET	1/	2.5	
21	"	"	TEB	SAF		1149	JE, GM, ET, ADAM PERRY LANG	1/1	3.6	
24	"	"	SAF	ASE		1150	JE	1/1	.8	
22	SCHIDE SP34	N4424E	OEO	OEO			T.O. + TOW ASSISTED, STRAIGHT GLIDES, TURNS, THERMALS, X COUNTRY CLUSTER			.9
25	G1159B	N908JE	ASE	VNY		1151	JE, JOE PAGANO, GWEN DOLYN BECK	1/	1.9	
29	"	"	VNY	PBI		1152	JE	1/1	4.9	
9-1	"	"	PBI	TEB		1153	JE, GM	1/1	2.4	
							Page Total	16/14	31.7	.9
							Amount Forward	6122 / 5852	7273.8	
							Total to Date	6138	7305.5	.9

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 1998	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider
9-4	G1159B	N908JE	TEB	TIST		1154	JE, GM, ET	1/1	3 7	
4	"	"	TIST	PBI		1155	JE, GM, ET	1/1	2 5	
8	"	"	PBI	TEB		1156	JE, GM, ET, MANDY ELLISON	1/1	2 7	
13	"	"	TEB	SAF		1157	JE, GM, ET, ALBERTO + LENIDA PINTO	1/	4 0	
9/15	GROB 103 IIA	N30786	OEØ	LCC			TOW & AND THERMALING			
9/15	G103 #A	N30786	OEØ	LCC			UNASSISTED T.O.C. Thermaling 3 ?			3
9/15	G103 #A	N30786	OEØ	LCC			UNASSISTED T.O.C. THERMALING			4
9/15	G103 #A	"	"	LCC			UNASSISTED TOW # LANDING IN LIGHT X wind			5
9/15	"	"	"	LCC			UNASSISTED TO WB LANDING - THERMALING STALLS, UNUSUAL ATT SPINS			3
9/15	"	~30786	"	LCC			AFTERN TOW	[signature] FIG 160935		6
9/15	"	~~N 30786~~	"	LCC			~~AFTERN TOW~~			3
9/17	G1159B	N908JE	SAF	ASE		1158	JE, ET			
19	"	"	ASE	IAD		1159	JE, ET, LARRY SUMMERS, CHELSEA + ?	1/1	6	
19	"	"	IAD	TEB		1160	JE, ET, GWYNDOLYN BECK	1/	3 5	3
25	"	"	TEB	DCA		1161	JE, LYNN FORESTER		6	4
25	"	"	DCA	IAD		1162	REPOSITION FOR CURRENT	1/1	7	7
25	"	"	IAD	TEB		1163	JE, LYNN FORESTER		1	1
26	"	"	TEB	PBI		1164	JE, GM		7	7
Oct 4	"	"	PBI	TEB		1165	JE, ET, LUBA, DARA	1/1	2 1	
									2 2	
							Page Total	5/6	22 4	2 4
							Amount Forward	6133	7305 5	9
							Total to Date		7328 4	2 2

I certify that the statements made by me on this form are true.

Pilot's Signature

Date 1998 OCT	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER
6	G-1159B	N908JE	TEB	BED		1166	JE, RHONDA SHEARER	1/1	6	
6	"	"	BED	TEB		1167	JE, RHONDA SHEARER + HUSBAND		7	
9	"	"	TEB	DCA		1168	JE, ET, ADAM PERRY LANG	1/1	7	
9	"	"	DCA	PBI		1169	JE, GM, ET, AP		2 0	
12	"	"	PBI	TEB		1170	JE, GM, ET, AP	1/	2 3	
15	"	"	TEB	PBI		1171	JE, SOPHIE BIDDLE		2 1	
19	"	"	PBI	TEB		1172	JE, SOPHIE BIDDLE	1/	2 2	
21	"	"	TEB	BED		1173	JE	1/1	6	
21	"	"	BED	TEB		1174	JE, ALAN DERSHOWITZ	1/1	8	
23	"	"	TEB	PBI		1175	JE, GM, ET, GWENDOLYN BECK	/	2 3	
NOV 7	"	"	PBI	TEB		1176	NO PASSENGERS	1/1	2 3	
7	"	"	TEB	PBI		1177	JE		2 3	
10	"	"	PBI	TEB		1178	JE	1/	2 5	
14	"	"	TEB	TIST		1179	JE, ET, CLAIRE HAZEL FRANCOIS	1/1	3 2	
15	"	"	TIST	PBI		1180	JE, GM, CLAIRE HAZEL, ET, FRANCOIS	1/1	2 4	
16	"	"	PBI	CMH		1181	JE, GM, ET, CLAIRE HAZEL, FRANCOIS	1/1	2 0	
16	"	"	CMH	TEB		1182	JE, GM, ET, FRANCOIS	1/	1 1	
20	"	"	TEB	TIST		1183	JE, GM, ET, AP	1/1	3 3	
1	C421B	N908GM	PBI · NORTH CO. - PBI					3/3	1 0	
							Page Total	16/12	34 4	
							Amount Forward	6146 / 5572	7328 4	3 3
							Total to Date	6162 / 5584	7362 8	3 3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1998 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
26	G-1159B	N908JE	TIST	PBI		1184	JE, GM	1	2.5		
29	"	"	PBI	TEB		1185	JE, GM, MARK EPSTEIN, LYNN FORESTER + 2, BOB, [illegible], GLEN DUBIN, CELINA, [illegible]		2.5		
Dec 4	"	"	TEB	PBI		1186	JE, ALEXIA	1	2.2		
8	"	"	PBI	TIST		1187	JE, SOPHIE BIDDLE	1	2.3		
8	"	"	TIST	SAV		1188	OPS 2 INSPECTION	1	3.0		
31	"	"	SAV	PBI		1189	OPS 2 COMPLETED		.9		
1999 JAN 1	"	"	PBI	TIST		1190	REPOSITION	1	2.1		
1	"	"	TIST	PBI		1191	JE, GM	1	2.5		
4	"	"	PBI	TEB		1192	JE, GM, MARK EPSTEIN, MANDY, [illegible], MEREDITH	1	2.2		
9	"	"	TEB	ABY		1193	JE, ALEXIS	1	2.5		
10	"	"	ABY	SAF		1194	JE, ALEXIS	1	3.0		
12	"	"	SAF	VNY		1195	JE, ALEXIA	1	1.6		
15	"	"	VNY	PBI		1196	JE, JEAN LUKE		4.2		
19	"	"	PBI	TIST		1197	JE, GM, ET	1	2.1		
24	"	"	TIST	TEB		1198	JE, GM, ET, ULGA [illegible]	1	3.6		
29	"	"	TEB	PBI		1199	JE, GM, ET, [illegible], CLEM, CELINA, [illegible]	1	2.3		
[illegible]	[illegible]	[illegible]	PMP - PBI - PMP			1	SEE MANEUVERS INDEX; A, B				1.3
FEB	G1159B	N908JE	PBI	TEB		1200	JE, GM, ET, AP, EVA, CELENA, [illegible], NANNY	1	2.5		
2	206B3	[illegible]	PMP	PMP		2	A, E				.8

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	14/8	42.0		2.0
Amount Forward	6162 / 5884	7362.8	3.3	
Total to Date	6176 / 5892	7404.8	3.3	2.6

Date 1999 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane		Glider		Helicop.	
3	206B3	59PH	PMP	PMP		3	A, E, F							
4	"	"	"	"		4	A, C - Full controls							
5	G-1159B	N908JE	TEB	PBI		1201	JE, GM, ET, MELANIE STARNES, MELINDA LUNTZ, CLAIRE HAZEL	1/1	2	1				
02/05	206B3	59PH	PMP	PMP		5	A, E - Advanced maneuvers							
02/06	206B	59PH	PMP-PBI	-PMP		6	A-E / started C + D							
2/7	"	"	"	"		7	A-17							
7	G-1159B	N908JE	PBI	TEB		1202	JE, GM, ET, MELINDA LUNTZ, MELANIE WALKER, 1 FEMALE		2	1				
9	"	"	TEB	TIST		1203	JE, GM, ET, AP, PRINCE ANDREW, STEVE BURGESS		3	3				
12	"	"	TIST	PBI		1204	JE, GM, ET, AP, PRINCE ANDREW, STEVE BURGESS, GWENDOLYN BECK, CLAIRE HAZEL, ANNA MALIN	1	2	6				
13	206B3	59PH	PMP-LCL	-PHI-PMP			A-F / Started G							
02.15	BH 206-B2	N7010H	VNY	PIRU VNY			PATTERNS, N. APPS, TIE, VERT TIC LOCK, A-WHITE OVER VNY, HOVER, QUICK STOPS, S/L AUTOS, 180 AUTOS	5						
14	G-1159B	N908JE	PBI	SAF		1205	JE, GM, LADNC KELSON	1/1	3	6				
15	"	"	SAF	VNY		1206	JE	1/1	1	6				
16	B206BII	N7010H	Vny -	Piru - Vny			TRAFFIC PATTERNS, APPROACHES, OGE HOVER, HOVER, PEDAL TURNS, A/SPEED CHANGES						1	0
17	G-1159B	N908JE	VNY	MRY		1207	JE + 3	1/1		7				
20	"	"	MRY	SAF		1208	JE	1/1	1	9				
21	"	"	SAF	TEB		1209	JE, GM, JENNIFER, SHARON, CLEMENTSEAC	1	3	5				
24	"	"	TEB	PBI		1210	JE, ET, EVA, GLENN, JORDON, NANNY, HEATHER, JO ANNE		2	4				
26	206L3	500JA	PMP	PMP			Reviewed A-F, Demo - H, J, + V						1	5
							Page Total	7/5	23	8			11	2
							Amount Forward	6176 / 5392	7404	8	3	3	2	0
							Total to Date	6183	7428	6	3	3	13	2

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 19 99	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
27	206L3	N500JA	PMP	PMP			A-F, I, J, M, + V / Demo - N				1 3
03/01	206L3	500JA	PMP	PMP			C, D, M, + V				1 1
3/1	206B2	N70PH	PMP-LNA-PBI-PMP				ENG TRAINING, INCLUD. [illegible]				4 1
03/02	206L3	500JA	PMP	PMP			N, H, + J				1 8
03/03	206L3	500JA	PMP-PBI-PMP				A-F				1 0
03/04	206L3	500JA	PMP-PBI-BAT-PMP				A, H (Pre-solo prep)				1 5
03/05	206L3	500JA	PMP-PBI-LNA-PMP				A, H (Pre-solo prep)				1 6
03/06	206L3	500JA	PMP-PBI-LNA-PMP				Finished prep / 1st solo at PMP				1 1
3/7	G-1159B	N908JE	PBI	TEB		1211	JG, GM, GT, MELANIA LUNTZ, NIK 3 FEMALES	1/	2 5		
3/13	PA28-161	N510PU	JVY	GRD			JONATHAN MAND - ATC CLEARANCES AND PROCEDURES FLIGHTS BY REFERENCE TO INSTRUMENTS	1/1	4 2		
3/13	PA28-161	N510PU	GRD	ORL			NAVIGATION SYSTEMS, PARTIAL PANEL, ATC COMMUNICATION, ILS APPROACH, [illegible]	1/1	4 8		
3/16	206L3	500JA	PMP	PMP			TRAFFIC PATTERN,				1 9
3/17	C421B	N9086M	PBI	EYW			JONATHAN MAND, VFR, [illegible], CHECKLIST, [illegible] NAVIGATION, MULTIENGINE OPERATIONS	1/1	1 5		
3/17	C421B	N9086M	EYW	PBI			JONATHAN MAND - VOR-DME HOLDING, VOR HOLDING [illegible]		2 5		
3/18	PA28-161	N510PU	ORL	DBN			JONATHAN MAND - INSTRUMENT APPROACH PROCEDURES 250NMXC FAR 61.65 (d)(2)(iii)	1/0	4 0		
3/19	PA28-161	N510PU	DBN	JVY			JONATHAN MAND - EMERGENCY OPERATIONS, ETC PARTIAL PANEL, PREFLIGHT PREP + PROC, + POSTFLIGHT	1/1	4 5		
3/21	G1159B	N908JE	TEST	TEB		1214	JEFFREY, TIFFANY GRANGA, CLEMENTINE HAMBRO, ENCA DOERRIC	1/	4 2		
3/23	206L3	500JA	PMP-2IS-SUA-PMP				DUAL CROSS COUNTRY				2 3
3/23	206L3	500JA	PMP	PMP			BCD				1 4
							Page Total	7/4	28 2		19 1
							Amount Forward	6183 / 5997	7428 6	3 3	13 2
							Total to Date	6190	7456 8	3 3	32 3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19 94 APRIL	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
3/23	206L3	500JA	PMP-NORTHWEST-PMP				12 [illegible] / Q	(+2)			1 [illegible]
3/24	206L3	500JA	PMP-SUA-2IS-PMP				SOLO CROSS COUNTRY				2 [illegible]
3/24	206L3	500JA	PMP-X51-PMP				SOLO CROSS COUNTRY				1 [illegible]
3/25	G1159B	N908JE	TEB	PBI		1215	JE, ET, DP, EVP, GLENDA, JORDAN, NANNY 2 FEMALES		1 5		
3/26	206L3	500JA	PMP-LNA-PMP				SOLO LOCAL				2 (
3/26	206L3	500JA	PMP-PHK-PMP				P, Q	(2)			1 [illegible]
3/27	G1159B	N908JE	PBI	TEST		1216	JE, ET, AP, 2 FEMALES	1/1	2 7		
3/29	"	"	TIST	PBI		1217	SHELLEY AND LEWIS TIFFANY KATHRYN GRANZA	1/1	2 9		
3/30	"	"	PBI	TEB		1218	REPOSITION TO TEB	1/1	2 5		
~~3/31~~	~~"~~	~~"~~	~~TEB~~	~~TIST~~		1219	GM, ALBERTO, LENDA, PIETRO, PHILLIPPE, MUGNIER, GRANLOS, VERONICA	1/1	3 5		
3/31	"	"	TIST	PBI		1220	JE, GM, ALBERTO, LENDA, ET, DP, PHILLIPPE, MUGNIER, GRANLOS, VERONICA	1/1	2 7		
4/2	"	"	PBI	ABQ		1221	JE, AP, ALBERTO, LENDA, PHILLIPPE, GRANLOS, I [illegible]	1/1	4 0		
4/4	"	"	ABQ	TEB		1222	JE, GM, CLAUDE, HAZEL	1/1	3 5		
4/5	206L3	500JA	PMP	PMP			SOLO LOCAL				6
4/5	206L3	500JA	PMP-LAL-PMP				A-I PVT FOR PVT TEST				1 2
4/6	206L3	500JA	PMP-BCT-PMP				A-II, M, N PREP FOR PVT TEST				1 7
4/7	206L3	500JA	PMP	PMP			A-E, G, K, L, O, R, U, V PRECHECK PVT TEST				1 6
4/8	G1159B	N908JE	TEB	PBI		1223	JE, GM, AP, ENEA, KERSTEN	1/1	2 3		
4/10	206L3	500JA	PMP-LNA-PBI-PMP				A-H, J, L, M, N, R, + V				1 [illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	8/7	26 2		15 8
Amount Forward	6190 / 5901	7456 8	3 3	32 3
Total to Date	6198 / 5908	7483 0	3 3	48 1

Date 1999 APR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPT
11	G1159B	N908JE	PBI	TEB		1224	JE, GM, ES, AP, CHARLES, MONICA, 2 FEMALES, INCA	1/1	3 2		
13	206L-3	500JA	PMP	PMP			[illegible] H-B, G, H, [illegible]				1 2
14	206L-3	500JA	PMP	PMP			SOLO LOCAL				1 7
16	G1159B	N908JE	TEB	~~PBI~~ MVY		1225	JE, GT, ALAN DERSHOWITZ, 1 MALE	1/1	7		
16	G1159B	"	MVY	BOS		1226	JE, GT, 1 MALE	1/1	5		
16	"	"	BOS	PBI		1227	JE, GT [illegible]	1/1	3 1		
20	"	"	PBI	TIST		1228	JE, GM, GT	1/1	2 4		
25	"	"	TIST	TEB		1229	JE, TIFFANY GRAMZA, DANIEL HELLER, ALEXEA WALLACE	1/1	4 0		
27	"	"	TEB	TIST		1230	JE, SOPHIE BIDDLE, 1 FEMALE		3 4		
MAY 2	"	"	TIST	TEB		1231	JE, SOPHIE BIDDLE, TIFFANY GRAMZA, SHELLEY LEWIS	1/D	3 7		
5	"	"	TEB	PBI		1232	JE, GM, [illegible] TIFFANY [illegible]	1/	2 3		
7	206L-3	500JA	PBI	PBI			Private Pilot Rotorcraft Helicopter Checkride "Passed" [illegible] 1750 [illegible] 10-31-91				9
7	"	"	PMP-LNA-PBI				PPL PREP - A-J, M, N, R + V				1 7
7	"	"	PBI	PMP			Return/started CPL Training				8
8	"	"	PMP-LNA-PBI				H, + 1 (Right), includ. 0-speed + S-Turns				1 6
8	"	"	PBI-LNA-PMP				H + 1 (Left)				1 4
10	G1159B	N908JE	PBI	BED		1233	JE, GM, CLAIRE HAZEL, TIFFANY GRAMZA, INCA DOCERIC	1/1	2 7		
10	"	"	BED	TEB		1234	GM, CLAIRE HAZEL, TIFFANY GRAMZA, INCA DOCERIC		9		
16	206L-3	500JA	PMP	PMP			H + 1 (Left + Right 500-700)				1 5

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

	Number of Landings	Airplane	Glider	Helicopter
Page Total	8/7	26 9		11 4
Amount Forward	6198 / 5408	7483 0	3 3	48 1
Total to Date	6207 / 5415	7509 9	3 3	59 5

CONFIDENTIAL DR_000028

Date 1997 M/D	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOP
17	G1159B	N908JE	TEB	SAF		1235	GT, RBJH	1/	3 6		
17	"	"	SAF	ABQ		1236	GS, RAH		2		
18	"	"	ABQ	DAL		1237	JE, GT TIFFANY GRAMZA	1/1	1 5		
18	"	"	DAL	PBI		1238	JE, GT, TIFFANY GRAMZA		2 3		
19	[illegible]	N500JA	PBI-LNA	PBI			STRAIGHT IN + 1 Kc AUTOROTATIONS				1 6
20	"	"	PMP	PMP			M, V, + Approaches to the surface, and noise sensitive proc.				1 1
21	"	"	PMP	DAB			O- via shoreline				2 6
21	"	"	DAB	PBI			O- via I-95				1 7
21	"	"	PBI	PMP			Return				3
23	G1159B	N908JE	PBI	TEB		1239	JE, GM, ET, TIFFANY GRAMZA	1/1	2 7		
	FLIGHT	TIMES	REPORTED	TO	INSURANCE		COMPANY		FOR		
27	G1159B	N908JE	TEB	PBI		1240	JE, GM, GT, GUY MAXWELL, BELLE, GLEN DUBIN, EVA, CELINA, JORDAN, MANNY DUBIN, [illegible]	1/1	2 3		
29	"	"	PBI	TIST		1241	JE, GM, ET		2 3		
30	"	"	TIST	PBI		1242	JE, GM, ET	1/1	2 8		
31	"	"	PBI	SAF		1243	JE, GM, ET	1/1	3 7		
JUN 4	"	"	SAF	PBI		1244	JE, GM, ET, TIFFANY GRAMZA	1/	3 2		
7	"	"	PBI	TEB		1245	JE, GM, ET, TIFFANY GRAMZA	1/1	2 5		
9	"	"	TEB	PBI		1246	JE, [illegible], MANDY GUSSOW, TIFFANY GRAMZA		2 3		
15	"	"	PBI	TEB		1247	JE, GM, TIFFANY GRAMZA, GWYNDOLYN BECK	1/1	2 5		
							Page Total	9/7	32 1		6 1
							Amount Forward	6207 / 5915	7509 9	3 3	59 5
							Total to Date	6216	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature [signature: David Rodgers]

Date 19 17	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
JUN 24	ZENITH	N282A	PBF-LNA	PBI			STALLS, EMERGENCY, CRITICAL ATTITUDE RECOVERY, EMERGENCY LANDING, STEEP TURNS	6/6	1 3		
19	G1159B	N908JE	TEB	PBI		1248	JE, GM, ET	1/	2 4		
27	"	"	PBI	TEB		1249	JE, ET, SHELLEY	1/1	2 5		
29	"	"	TEB	BED		1250	JE	1/1	8		
29	"	"	BED	TEB		1251	JE		1 0		
JUL 1	"	"	TEB	PBI		1252	JE, ET, TIFFANY GRAMZA	1/	2 3		
2	KATANA	N691DA	FPR	FPR			CHECK OUT, STALLS, STEEP TURNS, EMERGENCY LANDING, PRECAUTIONS	5/5	1 0		
3	G1159B	N908JE	PBI	TIST		1253	JE, CLAIRE HAZEL, TIFFANY GRAMZA	1/1	2 6		
4	"	"	TIST	TEB		1254	JE, CLAIRE HAZEL TIFFANY GRAMZA	1/1	3 7		
6	Bell 206 B-III	N169DG	PMP-SUA	-PMP			DUAL CROSS COUNTRY AT NIGHT MORE THAN 50NM				2 2
7	"	"	PMP-X44-LNA-PMP				SOLO NIGHT				2 3
13	"	"	PMP-X44-PMP				SOLO NIGHT				2 8
16	DA 20	N125MF	HWO	HWO			Pelican Kataney Vont (GO AROUND, 1 ENGINE OUT	2/2	9		
16	DA20	"	HWO-PBI	-HWO			JEFFREY EPSTEIN 1.0 TAKE-OFF, TAXING, SLOW FLIGHT, RECTANGULAR PATTERNS, LANDING	3/3	3 4		
15	G1159B	N908JE	TEB	PBI		1255			2 5		
22	"	"	PBI	SAF		1256	JE, GM, ET	1/1	3 4		
25	"	"	SAF	VNY		1257	JE, GM, ET, LISA	1/1	1 7		
29	"	"	VNY	OAK		1258	JE, SHELLEY	1/1	9		
29	"	"	OAK	SAF		1259	JE SHELLEY	1/1	2 2		
							Page Total	26/24	32 6		7 3
							Amount Forward	6216/5922	7542 0	3 3	65 6
							Total to Date	6242	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

[signature]

CONFIDENTIAL DR_000030

CONFIDENTIAL

Date 19__	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicop
JUL 29	G1159B	N908JE	SAF	PBI		1260	JE, SHELLEY		3 5		
AUG 4	"	SIMULATOR	JFK	JFK			STEEP TURNS, STALLS, WAKE TURBULENCE, ELECTRIC, REJECTED TAKE-OFF, HOLDING, 1/4 MILE T/O		3 8		
5	"	"	"	"			SINGLE ENG. APPS, APPROACHES & GO-AROUNDS, HYDRAULIC, DOUBLE ENGINE FAILURE, CIRCLE		3 8		
6	"	"	" -SWF	"			ICING, EMERGENCY DESCENT, NON-PRECISION APPROACH, SINGLE ENGINE WORK		2 7		
7	"	N908JE	TEB	PBI		1262	JE, GM, ET, CLAIRE HAZEL, 1 FEMALE; DAVE KILLARY	V	2 3		
8	"	"	PBI	TEB		1263	JE, ET, 1 FEMALE; DANC KILLARY	/	2 4		
11	"	"	TEB	PBI		1264	JE, ET	V	2 7		
14	"	"	PBI	MTRP		1265	JE, GM, ET, CLAIRE HAZEL	V	1 4		
14	"	"	MTRP	TIST		1266	JE, GM, ET, CLAIRE HAZEL	V	1 4		
18	"	"	TIST	TEB		1267	JE, GM, ET, CLAIRE HAZEL		2 6		
19	206L3	72PH	FLL	LNA			PILOT NOT REQUIRED, SHALLOW, STEEP, MAX PERF TAKE OFF, HYDR ...				1
23	G1159B	N908JE	PBI	TIST		1268	JE, ADAM, TIFFANY, PAULA	V	2 6		
26	"	"	TIST	PBI		1269	JE, ADAM, TIFFANY	V	2 7		
28	"	"	PBI	TEB		1270	JE, GM, ET	V	2 5		
SEP	"	"	TEB	AGC		1271	JE, ET	V	1 0		
1	"	"	AGC	CMH		1272	JE, ET	V	7		
2	"	"	CMH	TEB		1273	JE, ET, CLAIRE, VICTORIA, MRS HAZEL, COUSIN	V	1 4		
2	"	"	TEB	SAF		1274	JE, ADAM, SHELLEY, TIFFANY, ALBERTO, ELLEN ... PANTO		3 7		
5	"	"	SAF	SAN		1275	JE, SHANNON HEALY, TIFFANY, SHELLEY	V	1 7		
							Page Total	12/9	43 4		1 4
							Amount Forward	6142	7574 6	3 3	72 9
							Total to Date	6154	7618 0	3 3	74 3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000031

CONFIDENTIAL

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane		Glider		Helicopter	
5	G-1159B	N908JE	SAN	SAF	R	1276	JE, SHANNON HEALY	1/1	1	6				
7	G1	"	SAF	TEB		1277	JE, CLAIRE, VICTORIA HAZEL, ADAM	1/1	3	5				
8	"	"	TEB	CMH		1278	JE, CLAIRE HAZEL	1/1	1	4				
8	"	"	CMH	TEB		1279	JE, CLAIRE, MARSHALL, MALL		1	3				
9	"	"	TEB	PBI		1280	JE, ELIZABETH		2	5				
13	"	"	PBI	TEB		1281	JE, GM, PAULO EPSTEIN, MANDY, RALPH ELLISON, CLAIRE HAZEL	1/1	2	4				
17	"	"	TEB	PBI		1282	JE, GM, PAULA EPSTEIN, ET, CLAIRE HAZEL		2	4				
19	C-172	N2388L	LNA	LNA			A/C V OUT, SAT. [illegible]	2/2		7				
20	G-1159B	N908JE	PBI	TEB		1283	JE, GM, CLAIRE, ET	1/1	2	5				
22	"	"	TEB	PBI		1284	JE, ET, AP		2	6				
23	C-172	N2388L	LNA-	FXE			ED AMATO CFI RENEWAL	1/1	1	1				
23	"	"	FXE	LNA			ED AMATO CFI RENEWAL	1/1		5				
25	G-1159B	N908JE	PBI	TIST		1285	JE, GM, AP, SHELLY HARRISON	1/1	2	5				
26	"	"	TIST	TEB		1286	JE, GM, AP, SHELLY HARRISON	1/1	3	8				
OCT 7	"	"	TEB	TIST		1287	JE, SHELLEY LEWIS	1/1	3	5				
9	"	"	TIST	PBI		1288	JE, SHELLEY LEWIS	1/	2	6				
11	"	"	PBI	SAF		1289	JE	1/1	3	7				
12	"	"	SAF	TEB		1290	JE, SOPHIE BIDDLE	1/	3	5				
14	"	"	TEB	BED		1291	JE, GM, AP, AUDREY RAIMBAULT, ET	1/1		7				
							Page Total	16/14	42	8				
							Amount Forward	6254/5955	7618	0	3	3	74	3
							Total to Date	6270/5969	7660	8	3	3	74	3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000032

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
OCT 14	G-1159B	N908JE	BED	PBI		1292	JE, GM, ET, AP, AUDREY RAIMBAULT		2 9		
16	"	"	PBI	TIST		1293	JE, GM, AUDREY RAIMBAULT	1/1	2 5		
18	"	"	TIST	TEB		1294	JE, GM, AUDREY, MELINDA LUNTZ	1/1	3 6		
21	"	"	TEB	PBI		1295	JE, GM, ET	1/	2 7		
27	"	"	PBI	TEB		1296	JE, ET, GWYNDOLYN BECK, MR. BROWN, FREYA WISSING	1/	2 4		
29	"	"	TEB	PBI		1297	JE, GM, ET, CLAIRE HAZEL		2 4		
31	"	"	PBI	TEB		1298	JE, GM, ET, CLAIRE HAZEL		2 5		
NOV 5	"	"	TEB	BED		1299	JE, SHELLY ANNE LEWIS	1/1	8		
5	"	"	BED	PBI		1300	JE, SHELLY ANNE LEWIS	1/1	2 8		
9	"	"	PBI	TEB		1301	JE, ET, GARY ROXBURGH	1/1	2 6		
11	"	"	TEB	SAF		1302	JE, AP, ALBERTO PINTO, GR, 1 MALE		4 0		
11	"	"	SAF	VNY		1303	JE, GARY ROXBURGH		1 7		
13	"	"	VNY	SAN		1304	JE, GARY ROXBURGH		7		
13	"	"	SAN	SAF		1305	JE, GARY ROXBURGH		1 6		
14	"	"	SAF	TEB		1306	JE, AP, ALBERTO PINTO, 1 MALE, GR		3 6		
16	"	"	TEB	PBI		1307	JE, GARY ROXBURGH	1/1	2 4		
18	"	"	PBI	TEB		1308	JE	1/1	2 5		
19	"	"	TEB	PBI		1309	JE, MANDY ELLISON, JEAN MICHELLE, CATHY		2 5		
22	"	"	PBI	TIST		1310	JE, GM, ET, JEAN MICHELLE, CATHY		2 2		
							Page Total	9/7	46 4		
							Amount Forward	6270 5969	7660 8	3 3	74 3
							Total to Date	6279 [illegible]	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
NOV 25	G-1159B	N908JE	TIST	PBI		1311	JE, GM, ET	1/	2	6				
28	"	"	PBI	TEB		1312	JE, GM, ET, AP, GLEN, EVA, CELINA, JUNIOR, NANNY, RALPH		2	4				
30	"	"	TEB	SAF		1313	JE, GM, ET, AP, CLARE + VICTORIA HAZEL		3	9				
DEC 3	"	"	SAF	VNY		1314	JE, GM, ET	1/1	1	8				
4	"	"	VNY	PBI		1315	JE, ET		4	6				
7	"	"	PBI	TIST		1316	JE	1/	2	3				
7	"	"	TIST	PBI		1317	RETURN FOR CMP CARDS	●	2	7				
2000 JAN 4	"	"	PBI	TEB		1320	JE, GM, ET, AP, EVA, CELINA, JORDON MCLENDON WMTZ	1/1	2	4				
6	"	"	TEB	PBI		1321	JE, SOPHIE BIDDLE, 1 FEMALE		2	7				
8	"	"	PBI	ABY		1322	JE	1/1	1	2				
8	"	"	ABY	PBI		1323	JE		1	1				
10	"	"	PBI	TEB		1324	JE, SOPHIE, JOEL PASHCOW	1/1	2	4				
12	"	"	TEB	TIST		1325	JE, AP, SOPHIE, SHELLY		3	3				
16	"	"	TIST	TEB		1326	JE, AP, SOPHIE, SHELLY LEWIS	1/1	4	1				
24	206L3	N72PH	PMP	PMP			HOVER AUTO'S, FULL AUTOS, STUCK PEDALS, TAIL ROTOR FAILURE		~~1~~	~~5~~			1	5
24	206L3	"	PMP	PMP			EMERGENCY LANDING, 180 FULL AUTOS BOTH DIRECTIONS, ENGINE FAILURE ON TAKE OFF, SLOPES						1	5
25	"	"	PMP	PMP			NO HYDRAULICS, STUCK PEDALS, LTE, SETTLING WITH POWER, CONFINED AREAS						2	6
26	G1159-B	N908JE	TEB	PBI		1327	JE	1/1	2	6				
31	"	"	PBI	SAF		1328	JE, GM, ET, AP, FRAMED GILBERT, CLAIRE HAZEL	1/1	4	1				
							Page Total	9/7	44	2			5	[illegible]
							Amount Forward	6279 5976	7707	2	3	3	74	3
							Total to Date	6258	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000034

Date 20(?) FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
2	G1159-B	N908JE	SAF	VNY		1324	[illegible] AP, [illegible] CLIMB INTCL	1/1	1 8		
2	"	"	VNY	TEB		1330	[illegible], AP, CLIMB INTCL		4 7		
3	"	"	TEB	PBI		1331	NO PASSENGERS 72 MONTH INSPECTION [illegible]		2 5		
7	206L3	N72PH	PMP	PMP			REVIEWED A-G & H				1 2
8	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP B, G, O - INCLUD. N + UNUSUAL ATT.				1 5
9	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP G, H, J, S, V, + DGE maneuvers				1 5
9	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP H + I, includ. X-Wind techniques				1 2
11	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP C, G, H, I + O				1 6
11	206L3	N72PH	PMP-NW-PMP				CAL PREP COMPLETE REVIEWED I, includ. extended glide				1 1
14	206L3	N72PH	PMP	HST							0 6
14	206L3	N72PH	HST	PMP			QUICK REVIEW - G, I, N, + R				1 3
15	206L3	N72PH	PMP	FLL							4
15	206L3	N72PH	FLL	PMP							3
15	206L3	N72PH	PMP	FXE			"Commercial Pilot Rotorcraft Helicopter Checkride Passed" [illegible]				8
15	206L3	N72PH	FXE	PMP							2
16	206L3	72PH	PMP-LCL-PMP				IFR/L1				1 3
16	206L3	72PH	PMP-LCL-PMP				IFR/L7 + 8, includ. .9	1-NDB FXE			1 9
22	206L3	72PH	PMP-FXE-PMP				IFR/L7, 8, + NDB [illegible]	1-NDB FXE			1 7
23	EC120B	121TH	PBI	PBI			MARK MCAGGO				3
							Page Total	1	9 0		16 9
							Amount Forward	5238 / 5983	7751 4	3 3	79 3
							Total to Date	5239 / 5984	7760 4	3 3	96 2

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000035

CONFIDENTIAL

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELIC.	
FEB 23	206L3	N72PH	PMP - FXE - PMP				IFR / L7, 8, + 10 DOUBLE LANDING	S/ R. H[illegible] 306054700 FII 12/01				
24	206L-3	N72PH	PMP-FXE - PMP				IFR / L6, 9, + 10	S/ R. H[illegible] 306054700 FII 12/01			1	
25	206L-3	N72PH	PMP-FXE - PMP				IFR / L7 + 9	S/ R. H[illegible] 306054700 FII 12/01			1	
26	206L-3	N72PH	PMP-LNA-SUA-[illegible]-PMP								2	
29	"	"	PMP	FMY			IFR / L6, 7, 9, 10 + 11				1	
29	"	"	FMY	VRB							1	
29	"	"	VRB	FXE-PMP			S/ R. H[illegible] 306054700 FII 12/01				1	
MAR 2	"	"	PMP-FXE-PMP			PREP	IFR / L1, 3, 4, 5, 9, + 10	S/ R. H[illegible] 306054700 FII 12/01			1	
2	"	"	PMP-F45-LNA-PMP			PREP	IFR / L2, 6, 7, 9, + 10	S/ R. H[illegible] 306054700 FII 12/01			1	
3	"	"	PMP	PMP		PREP	IFR / L4, 6-8, 16, + 17	S/ R. H[illegible] 306054700 FII 12/01			1	
3	"	"	PMP	LNA		PREP	IFR / L6, 8, + 12 (IFR NOTES)	S/ R. H[illegible] 306054700 FII 12/01				
10	"	"	PMP	PMP			IFR REVIEW / L9 + 10	S/ R. H[illegible] 306054700 FII 12/01				
14	"	"	PMP	PMP			Instrument Rating Add-on Helicopter Checkride "PASSED" [illegible]				1	
APR 1	"	"	PMP-LNA-[illegible]-PMP				LEFT SEAT FLYING				1	
24	G-1159B	N908JE	PBI	PBI		1332	RST FLIGHT	1		5		
MAY 3	"	"	"	"		1333	3 NIGHT TAKE OFF + LANDINGS [illegible] 2 VOR APPROACHES, VOR HOLDING			7		
4	"	"	PBI	TEB		1334	REPOSITION	1	2	6		
4	"	"	TEB	PBI		1335	[illegible]		2	4		
7	"	"	PBI	TIST		1336	[illegible]	1	2	2		
							Page Total	[illegible]	[illegible]	4		1[illegible]
							Amount Forward	[illegible]	776[illegible]	4	3 3	9[illegible]

I certify that the statements made by me on this form are true.

[signature]

CONFIDENTIAL DR_000036

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane		Glider		Helicopter	
MAY 8	G-1159B	N908JE	TIST	TEB		1337	JE, GM, ET, AP, JEAN LUC BRUNEL, CHRISTINA ESTRADA, LESLEY + MICHELLE BERNHEIM	1/	3	8				
12	"	"	TEB	PBI		1338	JE, GM, ET, AP, PRINCE ANDREW, BORGERUD, ACEXCA, 1 MALE	1/1	2	4				
15	"	"	PBI	TEB		1339	JE, AP, PAULA EPSTEIN, ALEXANDRA	1/1	2	4				
16	"	"	TEB	TIST		1340	JE, SHELLEY LEWIS	1/1	3	6				
21	"	"	TIST	TEB		1341	JE, SHELLEY LEWIS	1/1	4	0				
30	"	"	TEB	MDW		1342	REPOSITION		1	9				
31	"	"	MDW	TEB		1343	JE, GM		1	7				
JUN 1	"	"	TEB	PBI		1344	JE, GM, ET, AP, 1 FEMALE		2	4				
4	"	"	PBI	TEB		1345	JE, GM, ET, 1 FEMALE	1/1	2	4				
9	"	"	TEB	SAF		1346	JE, GM, 1 FEMALE	1/	3	9				
12	"	"	SAF	VNY		1347	JE	1/1	1	7				
14	"	"	VNY	SFO		1348	JE	1/1	1	2				
14	"	"	SFO	LAS		1349	JE	1/	1	2				
15	"	"	LAS	PHX		1350	JE	1/1	1	0				
17	"	"	PHX	PBI		1351	JE	/1	3	9				
18	"	"	PBI	TEB		1352	JE	1/1	2	6				
25	"	"	TEB	TIST		1353	JE, GM, ET, AP, PETER MARINO, 2 FEMALES	1/1	3	7				
25	"	"	TIST	TEB		1354	ELIZABETH JOHNSON, FREDERIC + ALEXANDRA FEKKAI, AUDREY BLAISE, PETER MARINO	1/1	3	7				
25	"	"	TEB	PBI		1355	REPOSITION		2	4				
							Page Total	14/12	49	9				
							Amount Forward	6292 / 5986 / 6306	7768	8	33		112	6

I certify that the statements made by me on this form are true.

David Rodgers

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
JUN 30	G-1159B	N908JE	PBI	TIST		1356	REPOSITION	1/0	2 8		
30	"	"	TIST	PBI		1357	JE, GM, CT, AP, SOPHIE BIDDLE		2 5		
JUL 3	"	"	PBI	TEB		1358	JE, ET, AP, GM, SOPHIE BIDDLE, MELINDA LUNTZ	1	2 5		
5	"	"	TEB	LFPB		1359	JE, GM	1	6 9		
6	"	"	LFPB	LIEO		1360	JE, GM	1	2 0		
9	"	"	LIEO	GMMX		1361	JE, GM	1	2 9		
11	"	"	GMMX	GMFF		1362	JE, GM	1	9		
11	"	"	GMFF	LEBB		1363	JE, GM	1	1 9		
11	"	"	LEBB	EGGW		1364	JE, GM	1	1 7		
12	"	"	EGGW	EGAA		1365	JE, GM	1	1 0		
12	"	"	EGAA	BGR		1366	JE, GM	1	6 4		
12	"	"	BGR	TEB		1367	JE, GM		1 1		
14	"	"	TEB	PBI		1368	JE, SHELLEY LEWIS	1	2 5		
19	"	"	PBI	TEB		1369	JE, SHELLEY LEWIS GARY ROXBURGH	1	2 5		
19	"	"	TEB	SAF		1370	JE, GM, ET, AP, SOPHIE, JASMINE, 1 MALE, GARY ROXBURGH		4 1		
AUG 2	"	SIMULATOR	JFK	JFK			STEEP TURNS, STALLS, SLOW FLIGHT, REJECTED TAKE-OFF		3 9		
3	"	"	JFK - TEB - SWF				SINGLE ENGINE APPROACHES, ELECTRICAL FAILURES, HYDRAULIC FAILURES		4 0		
4	"	"	JFK - SWF - JFK				ICING, EMERGENCY DESCENT, NON PRECISION APPROACHES, ENGINE MALFUNCTIONS		4 1		
21	"	N908JE	PBI	SAF		1378	JE, GM, ET, AP	1	3 5		
							Page Total	12	57 2		
							Amount Forward	6306 5998 6318	7818 7	3 3	112 6

I certify that the statements made by me on this form are true

David Rodgers

Date 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
AUG 24	G-1159B	N908JE	SAF	VNY		1379	JE, KELLY SPAMM	✓ 1	1 7		
26	"	"	VNY	TEB		1380	JE, GM, AP	✓	4 9		
31	"	"	TEB	PBI		1381	JE		2 2		
SEP 6	"	"	PBI	TEB		1382	JE	✓ 1	2 5		
9	"	"	TEB	PBI		1383	JE, GM, ET, AP		2 3		
10	"	"	PBI	TIST		1384	JE, GM, ET, AP, CHERI KRAPE	✓ 1	2 5		
12	"	"	TIST	TEB		1385	JE, GM, ET, AP, CHERI KRAPE	✓	3 9		
21	"	"	TEB	SAF		1386	JE, GM, AP, JOE PAGANO, 1 FEMALE		4 2		
25	"	"	SAF	VNY		1387	JE, KELLY SPAMM	✓ 1	1 8		
26	"	"	VNY	TEB		1388	JE, TIFFANY GRAMZA	✓	4 8		
29	"	"	TEB	TIST		1389	JE, PETER MARINO, 1 PERSON	✓ 1	3 6		
30	"	"	TIST	PBI		1390	JE, PETER MARINO, 1 FEMALE	✓ 1	2 6		
OCT 2	"	"	PBI	TEB		1391	JE, GM, ET, 1 FEMALE	✓ 1	2 5		
5	"	"	TEB	PBI		1392	JE, SHELLEY LEWIS		2 4		
10	"	"	PBI	TEB		1393	JE, GM, ET	✓	2 5		
13	"	"	TEB	LGA		1394	~~JE~~ REPOSITION FOR PARIS		5		
13	"	"	LGA	LFPB		1395	JE, VOR HOLDING	✓	7 1		
15	"	"	LFPB	EGBB		1396	JE, SHELLEY LEWIS	✓ 1	1 3		
17	"	"	EGBB	BGR		1397	JE, SHELLEY LEWIS	✓ 1	6 4		
							Page Total	13 / 10	59 7		
							Amount Forward	6318 6005	7875 9	3 3	112 1
							Total to Date	6331 6015	7935 6	3 3	112 6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19— 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
OCT 17	G-1159B	N908JE	BGR	LGA		1398	JE, SHELLEY LEWIS	✓	1 3		
20	"	"	PBI	MIA		1400	JE, GM, ET, KELLY SPAMM GARY ROXBURGH		6		
21	"	"	MIA	TIST		1401	JE, GM, ET, KELLY SPAMM RICARDO LEGORETTA GARY ROXBURGH		2 3		
23	"	"	TIST	EWR		1402	JE, GM, ET GARY ROXBURGH	✓ 1	3 9		
25	"	"	EWR	EGGW		1403	JE, GM, ET	✓ 1	6 4		
28	"	"	EGGW	BGR		1404	JE, GM, ET NORTHERN LIGHTS		7 1		
29	"	"	BGR	PBI		1405	JE, GM, ET		3 0		
30	"	"	PBI	TEB		1406	JE, GM, ET	✓ 1	2 7		
31	"	"	TEB	PBI		1407	JE, SHELLEY LEWIS		1 9		
NOV 5	"	"	PBI	TIST		1408	JE, SHELLEY LEWIS, JESSICA	✓	2 4		
7	"	"	TIST	TEB		1409	JE, SHELLEY LEWIS, JESSICA BARER	✓	4 4		
9	"	"	TEB	PBI		1410	JE, ET	✓ 1	2 4		
12	"	"	PBI	CMH		1411	JE,	✓ 1	2 2		
12	"	"	CMH	PBI		1412	JE	✓ 1	2 3		
15	"	"	PBI	SAF		1413	JE, GM, ET		4 2		
16	"	"	SAF	VNY		1414	JE, GM, ET	✓ 1	1 9		
17	"	"	VNY	SAN		1415	GM, ET	✓	7		
17	"	"	SAN	PBI		1416	JE, GM, ET		4 0		
19	"	"	PBI	BED		1417	JE, GM, ET	✓ 1	2 6		
							Page Total	11 / 9	56 3		
							Amount Forward	6331 6015	7935 6	3 3	112 6
								6342	[illegible]		

I certify that the statements made by me on this form are true.

David Rodgers

Date 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane		Glider		Helicopter	
NOV 19	G-1159B	N908JE	BED	TEB		1418	JE, SHELLEY LEWIS		1	1				
22	"	"	TEB	DCA		1419	JE, AP, SHELLEY LEWIS	1/1	1	0				
22	"	"	DCA	PBI		1420	JE, AP, SHELLEY LEWIS	1/1	2	2				
28	"	"	PBI	TIST		1421	JE, GM		2	4				
30	"	"	TIST	PBI		1422	JE, GM	1/1	2	7				
DEC 1	"	"	PBI	DFW		1423	JE, GM	1/1	2	7				
1	"	"	DFW	ABQ		1424	JE, GM, RICARDO LEGORRETA	1/1	1	8				
2	"	"	ABQ	SAF		1425	REPOSITION	1/1		5				
2	"	"	SAF	TEB		1426	JE, GM		3	5				
5	"	"	TEB	LFPB		1427	JE, GM, ET, KELLY SPAMM	/1	6	8				
6	"	"	LFPB	EGGW		1428	JE, GM, ET, KELLY SPAMM		1	0				
7	"	"	EGGW	EGYM		1429	JE, GM, KELLY SPAMM, TOM PRITZKER, 1 FEMALE (MARHAM AIR FORCE BASE)			5				
7	"	"	EGYM	EGSH		1430	REPOSITION (SANDRINGHAM NORWICH, ENGLAND)			4				
9	"	"	EGSH	CYQX		1431	JE, GM, ET, KELLY SPAMM (BLOWING SNOW ON RUNWAY)		5	0				
9	"	"	CYQX	PBI		1432	JE, GM, ET, KELLY SPAMM		4	7				
11	"	"	PBI	TEB		1433	JE, GM, ET, VIRGINIA	1/1	2	6				
14	"	"	TEB	TIST		1434	JE, GM, AP, VIRGINIA	1/1	3	5				
14	"	"	TIST	PBI		1435	REPOSITION FOR OPS 2 + TCAS		2	4				
2001 JAN 13	"	"	PBI	PBI		1436	TCAS CERTIFICATION	1/1		7				
							Page Total	9/10	45	5				
							Amount Forward	6342 6024+ 6351	7991	9	3	3	112	6

I certify that the statements made by me on this form are true.

David Rodgers

Date 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
JAN 16	G-1159B	N908JE	PBI	LCQ		1437	JE, GM, ET	1/1	8		
16	"	"	LCQ	TEB		1438	JE, GM, ET	1/1	2 1		
17	"	"	TEB	PBI		1439	JE, SHELLEY LEWIS		2 4		
22	"	"	PBI	TEB		1440	JE, GM, ET, AP	1/1	2 5		
23	"	"	TEB	LFPB		1441	JE, SHELLEY LEWIS	1/1	6 7		
25	"	"	LFPB	CYQX		1442	JE, SHELLEY LEWIS	1/1	5 9		
25	"	"	CYQX	TEB		1443	JE, SHELLEY LEWIS		2 7		
26	"	"	TEB	PBI		1444	JE, GM, ET, VIRGINIA ROBERTS		2 4		
18	C172	N1446V	PBI LNA	PBI LNA			C172 VOUT PETE SORENSON	2/2	4		
18	"	"	LNA	LCQ			B727 CLOSING N505LS	1/1	2 4		
19	"	"	LCQ	MCO			JONATHAN MANO – INSTRUMENT COMPETENCY CHECK – CASSIE CATEGORY		2 0		
19	"	"	MCO	LNA			→		1 9		
22	G1159B	N908JE	PBI	TIST		1445	JE, GM, ET, VIRGINIA ROBERTS	1/1	2 4		
30	"	"	TIST	PBI		1446	JE, GM, ET, VIRGINIA ROBERTS	1/1	2 6		
FEB 3	C-421B	N908GM	SAF	DFW			JONATHAN MANO – FAR 61.31(G) SATISFACTORY QUALIFICATION FL270	1/1	3 0		
17	B-727-200	SIMULATOR	MEM	MEM			STALLS, STEEP TURNS, ENGINE START, TURNS, CLIMBS, DESCENTS, V1 ENGINE FAILURE, WINDSHEAR		2 5		
18	"	"	"	"			APU FIRE, RTO, ENGINE FIRE, ONE & TWO ENGINE APPROACH, FLAP ASSYMETRY, NON RADAR APPROACH		3 0		
19	"	"	DFW	NGIN			PUSH BACK, DUTCH ROLL, EMERGENCY DESCENT, CIRCLING APPROACH, MANUAL REVERSION		2 2		
20	"	"	MEM	MEM			JAMMED STABILIZER, SINGLE ENGINE LANDING, 2 ENGINE GO AROUND, ..., STEEP TURNS, HOLDING		3 5		
							Page Total	10/9	52 4		
							Amount Forward	6351 / 6024	8637 4	33	112
							Total to Date	6361			

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

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Date 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
21	B-727-200	SIMULATOR	DFW	DFW			RUNWAY STABILIZER, MANUAL GEAR EXTENSION, LANDING FUEL DUMPING, RTO, BRAKE COOLING, BATTERY START		2	5				
22	"	SIMULATOR	MGM	MGM			STEEP TURNS, STALLS, SINGLE ENGINE GO AROUND, 1 & 2 ENGINE APPROACHES, RTO, START MALFUNCTION		2	5				
23	"	"	"	"			B727 CHECK RIDE		2	4				
23	C-421B	N908GM	DFW	ADS			JONATHAN MANO - HIGH DENSITY AIRPORT OPERATIONS	1/1		6				
23	"	"	ADS	PNS			JONATHAN MANO - SID, ICING OPERATIONS, FUEL MANAGEMENT, PERFORMANCE CHARTS	1/	3	2				
23	"	"	PNS	PBI			JONATHAN MANO - LOST COMMUNICATIONS PROCEDURES, WEIGHT & BALANCE		3	1				
MAR 3	"	"	PBI	LCQ			KRISTY RODGERS - CLIMBS, DESCENTS, STRAIGHT & LEVEL FLIGHT		1	9				
3	"	"	LCQ	LAL			KRISTY RODGERS - TURNS, STRAIGHT + LEVEL		1	3				
3	"	"	LAL	PBI			KRISTY RODGERS - DESCENTS, S+L		1	1				
5	G-1159B	N909JE	PBI	CYJT		1464	JG, GM, GT, VIRGINIA ROBERTS GARY ROXBURGH		3	8				
6	"	"	CYJT	LFPB		1465	JG, GM, GT, VR GARY ROXBURGH	1/	5	3				
8	"	"	LFPB	LEGR		1466	JG, GM, GT, VR, ALBERTO + LINDA PINTO, 1 GERMAN, RICARDO LEGORRETA ECT	1/1	2	5				
8	"	"	LEGR	GMTT		1467	JG, GM, GT, VR, ALBERTO + LINDA PINTO, 1 GERMAN	1/		8				
9	"	"	GMTT	EGGW		1468	JG, GM, GT, VR RGR	1/	2	8				
11	"	"	EGGW	BGR		1469	JG, GM, GT, VR RGR		6	6				
11	"	"	BGR	TEB		1470	JG, GM, GT, VR RGR		1	2				
14	C-421B	N908GM	PBI	FLL			LARRY MORRISON - TAXIING, S+L, CLIMBS, DESCENTS, TURNS	1/1		6				
14	"	"	FLL	PBI			LARRY MORRISON, CLIMBING + DESCENDING TURNS S+L	1/1		4				
15	G-1159B	N909JE	TEB	FSP		1471	JG, GM, AP, ALEXANDRA WALLACE, BRIAN KOLECK RGR	1/1		6				
							Page Total	8/7	43	6				
							Amount Forward	636 / 6043	8089	8	3	3	112	6
							Total to Date	6369 / 6050	8133	4	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
MAR 15	G-1159B	N909JE	ISP	LCQ		1472	JE, GM, AP, ALEXEB WALLGERT, BANU KUCUKKOYLU RGR	1/1	2 6		
15	"	"	LCQ	PBI		1473	JE, GM, AP, AW, BK RGR	1/1	9		
16	"	"	PBI	/ALA		1474	JE, GM, AP, AW, BK, CHERI LYNCH RGR	1/1	7		
16	"	"	MSA	TIST		1475	JE, GM, RP, AV, BK, CL, ED TUTTLE RGR	1/	2 2		
19	"	"	TIST	LGA		147[illegible]	JE, GM, AP, AW, BK, CL, E TUTTLE RGR	1/	3 8		
22	"	"	LGA	PBI		1477	JE, GM, ES, JOE PAGANO, EVA, CELINA, JORDAN DUBIN, MYA DUBIN & NANNY AW RGR	1/1	2 4		
23	C-421B	N908GM	PBI	OPF			KRISTY RODGERS - S&L, TURNS	1/1	6		
23	"	"	OPF	FLL			KRISSY RODGERS - S&L, TURNS	1/1	4		
23	"	"	FLL	PBI			JONATHAN MANO - ILS - PPI		6		
24	"	"	PBI	ISM			JONATHAN MANO - IFR CROSS COUNTRY STAR, CROSSING RESTRICTIONS,	1/1	1 0		
24	"	"	ISM	PBI			JONATHAN MANO - IFR CROSS COUNTRY ATC, MISCOMMUNICATIONS.	1/1	1 1		
27	G-1159B	N909JE	PBI	TEB		1478	JE, GM, ET, VR, 2 GEMALGS, BANU KUCUKKOYLU RGR	1/1	2 5		
29	"	"	TEB	SAF		1479	JE, GM, AP, VR, BK, MARVIN MINSKY, HENRY JARECKI		4 1		
31	"	"	SAF	PBI		1480	JE, GM, AP, VR, NADIA BJORLIN, HENRY JARECKI, MARVIN MINSKY	1/	3 3		
APR 1	"	"	PBI	LCQ		1481	JE, GM, AP	1/1	1 0		
1	"	"	LCQ	TEB		1482	JE, GM, AP		2 1		
3	"	"	TEB	GAI		1483	JE, HEATHER MANN, LYDIA	1/1	9		
3	"	"	GAI	TEB		1484	JE, HEATHER MANN, LYDIA		8		
4	"	"	TEB	BCP		1485	JE, RHONDA	1/1	8		
							Page Total	15/12	51 9		
							Amount Forward	6364 / 6650	8133 4	3 3	112 1
							Total to Date	6384 / 6662	8165 3	3 3	112 1

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19__ 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
APR 4	G-1159B	N909JE	BED	TEB		1486	JE			9				
5	"	"	TEB	PBI		1487	JE, GT, BK		2	3				
6	C-421B	N908GM	PBI	FLL			LARRY MORRISON. TAXI, T.O., CLIMBS TURNS, DESCENTS, LANDING	1/		7				
6	"	"	FLL	PBI			LARRY MORRISON. TAKE OFF & LANDING, TAXI, CHECKLIST, CLIMBS, TURNS, DESCENTS	1/1		6				
9	G-1159B	N909JE	PBI	ACY		1488	JE, GT, VR, BK, JOANN	1/	2	4				
9	"	"	ACY	TEB		1489	JE, GT, VR, BK, JOANN			7				
11	"	"	TEB	TIST		1490	JE GM, AP, BK, VR, JOANN	1/	3	5				
16	"	"	TIST	PBI		1491	JE GM, AP, VR, BK, GWENDOLYN BECK	1/1	2	7				
17	"	"	PBI	TEB		1492	JE, GM, GT, AP, BK, GB, JOEL PASHKOW, MICHELLE, KALI, TEGMAC	1/1	2	5				
20	"	"	TEB	PBI		1493	JE, GM, GT, BK		2	3				
23	"	"	PBI	ORL		1494	JE, GM, GT, KYLE	1/1		8				
23	"	"	ORL	TEB		1495	JE, GM, GT, KYLE, HENRY JARECKE, SPAX	1/	2	2				
27	"	"	TEB	SAF		1496	JE, BK		3	9				
29	"	"	SAF	VNY		1497	JE, BK, KELLY BOVINA	1/1	1	7				
MAY 2	"	"	VNY	SAN		1498	JE	1/1		7				
2	"	"	SAN	LIT		1499	JE	1/1	3	6				
3	"	"	LIT	ADS		1500	JE	1/1		9				
3	"	"	ADS	SAT		1501	JE, VIRGINIA ROBERTS	1/1		9				
5	"	"	SAT	PBF		1502	JE, VR; GARY ROXBURGH	1/1	2	4				
							Page Total	14/11	35	1				
							Amount Forward	6384 6062	8165	3	3	3	112	6
							Total to Date	6398 [illegible]	[illegible]	4	2	3	11[illegible]	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000045

Date 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival		Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category...		
			From	To					AIRPLANE	GLIDER	HELICOPTER
MAY 7	G-1159B	N909JE	PBI	CHO		1503	JE, GM, GT, INCA ROCKRIG	1/1	2 0		
7	"	"	CHO	TEB		1504	JE, GM, GT, INCA DOERRIG		1 1		
16	C421B	N908GM	PBI	MCN			JONATHAN MANO - CROSS COUNTRY IFR, LARRY MORRISON, PATSY, KRISTY	1/1	2 6		
16	"	"	MCN	27K			JONATHAN MANO - IFR CROSS COUNTRY LARRY MORRISON, PATSY, KRISTY	1/1	2 1		
16	"	"	27K	OSU			JONATHAN MANO - IFR XC LARRY MORRISON	1/1	1 2		
16	"	"	OSU	JVY			JONATHAN MANO - GPS OPERATIONS		1 2		
11	"	"	JVY	27K			NO PASSENGERS	1/1	7		
12	"	"	27K	IMS			NO PASSENGERS	1/1	7		
13	"	"	IMS	GNV			RYAN COOMER - CLIMBS, TURNS, DESCENTS, ATT. FL PATSY, KRISTY, ALYSSA	1/1	3 0		
13	"	"	GNV	PBI			RYAN COOMER - RADIO COMMUNICATIONS CAPABLE PATSY, KRISTY, ALYSSA		1 8		
14	G1159B	N909JE	TIST	TEB		1506	JE, GM, GT, BK, VR 1 FEMALE	1/1	5 8		
20	C-421B	N908GM	PBI	ISM			PATSY, KRISTY, ALYSSA KRISTY - [illegible], MP, PROPS, MIXTURE	1/1	1 1		
20	"	"	ISM	PBI			PATSY, KRISTY, ALYSSA	1/	1 1		
24	G1159B	N909JE	TEB	PBI		1507	JE, GM, GT, AP, FEMALE	1/1	2 6		
25	C-421B	N908GM	PBI	LAL			PATSY, KRISTY, ALYSSA	1/1	1 3		
26	"	"	LAL	MCN			PATSY, KRISTY, ALYSSA COMMS [illegible] TEMPERATURE [illegible], TAXI	1/1	1 8		
27	"	"	MCN	ISM			PATSY, KRISTY	1/1	1 8		
28	"	"	ISM	PBI			PATSY, KRISTY - GPS OPERATIONS PERFORMANCE - CRUISE STAR	1/1	1 1		
28	G1159B	N909JE	PBI	TEB		1508	JE, GM, GT, AP, JOEL PASHCOW, IMOLG 2 FEMALE	1/1	2 5		
							Page Total	16 15	33 5		
							Amount Forward	6398 6073	8200 4	3 3	112 6
							Total to Date	6414	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date 19 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane		Glider		Helicopter	
4-2	B727-31	N505LS	LCQ	PBI			REPOSITION GEORGE WALLGREN	/	1	0				
JUN 6-1	G-1159B	N909JE	TEB	PBI		1509	JE, GM, ET, AP, BANU KUCUK KOYLU	1/1	2	6				
3	"	"	PBI	TIST		1510	JE, VIRGINIA ROBERTS, BANU KUCUKKOYLU	1/	2	4				
5	"	"	TIST	TEB		1511	JE, VR, BK	1/1	3	8				
8	"	"	TEB	CYUL		1512	JE GM, NAOMI CAMPBELL, REBECCA WASSIG, MICHAEL LAVALLEE, ANNA MALOVA, DAVID GENARO	1/1	1	1				
12	"	"	CYUL	TEB		1513	REPOSITION (APU BLEED AIR DUCT)	1/1	1	1				
12	"	"	TEB	PBI		1514	JE	1/1	2	3				
13	"	"	PBI	TEB		1515	JE, CAROL	1/1	2	4				
15	"	"	TEB	PBI		1516	JE, GM, SHERIDAN, CAROLYN, 1 FEMALE		2	3				
18	"	"	PBI	TEB		1517	JE, GM, 1 FEMALE	1/1	2	5				
22	"	"	TEB	LFPO		1518	JEFFREY, GM, CRISTALLE WASSIG, EKATERINA GAINEVA	1/1	7	0				
23	"	"	LFPO	LFMN		1519	JE, GM, 1 FEMALE	1/1	1	2				
25	"	"	LFMN	LIML		1520	JE, GM, 1 FEMALE	1/1		7				
26	"	"	LFML	LFPB		1521	JE, GM	1/1	1	4				
28	"	"	LFPB	LPAZ		1522	JE, GM, ET, ED TUTTLE	1/1	3	9				
28	"	"	LPAZ	TIST		1523	JE, GM, ET, ED TUTTLE		6	0				
JUL 4	"	"	TIST	PBI		1524	JE, AP, VR, 1 FEMALE	1/1	2	5				
8	"	"	PBI	TEB		1525	JE, GM, ET, AP, VR, SHERIDAN GIBSON, 1 FEMALE, GARY ROXBURGH	1/1	2	7				
11	"	"	TEB	CPS		1526	JE, GM, ET, VR GARY ROXBURGH		2	3				
							Page Total	16/14	49	2				
							Amount Forward	6414 6088	8233	9	3	3	112	6
							Total to Date	6430 6102	8283	1	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 200_	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane		Glider		Helicopter	
JUL 16	G-1159B	N909JE	CPS	SAF		1527	REPOSITION - PITOT STATIC LEAK GARY ROXBURGH	1/1	2	2				
16	"	"	SAF	TEB		1528	JE, ET, GM, VR GARY ROXBURGH	1/	3	5				
23	"	"	PBI	TIST		1530	JE, SHELLEY LEWIS	1/1	2	5				
28	"	"	TIST	PBI		1531	JE, VIRGINIA ROBERTS	1/1	2	6				
29	"	"	PBI	ISP		1532	JE	1/1	2	5				
29	"	"	ISP	TEB		1533	JE	1/		7				
AUG 1	"	"	TEB	PBI		1534	JE, GM, ET, 1 FEMALE	1/1	2	4				
3	B-727-31	N908JE	JAX	PBI			MIKE DONOVAN SIM RIGHT SEAT	4/4	1	4				
4	B-727-100	PAN AM SIMULATOR	MDR	MFA			NIGHT CURRENCY		1	0				
5	G-1159B	N909JE	PBI	TEB		1535	JE, GM, DP, ET, TAYLOR	1/1	2	6				
5	"	"	TEB	PBI		1536	NO PASSENGERS		2	3				
7	B-727-31	N908JE	PBI	LGA		1	MIKE DONOVAN	1/1	2	6				
7	"	"	LGA	ABQ		2	JE, GM, ET, DP, 2 FEMALES	1/1	4	0				
14	C-421B	N908GM	PBI	JAN			JONATHAN MAND - INSTRUMENT COMPETANCY CHECK SATISFACTORY	1/1	3	9				
14	"	"	JAN	AMA			JONATHAN MAND - LPA WITH GS X5 KNOT XWIND LANDING	1/1	3	6				
14	"	"	AMA	ØEØ			JONATHAN MAND -	1/	1	7				
15	"	"	ØEØ	ABQ			JONATHAN MAND - HIGH DENSITY ALTITUDE OPERATIONS	1/1		5				
15	"	"	ABQ	2U8RO			JONATHAN MAND - SHORT FIELD AIRPORT OPERATIONS	1/1		7				
16	B-727-31	N908JE	ABQ	PBI		6	JE, GM, ET, DP, FLOOR, JONATHAN MAND	1/	3	8				
							Page Total	20/17	44	5				
							Amount Forward	6430 / 6162	8283	1	3	3	112	6
							[illegible]	6450	[illegible]					

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

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Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
AUG 19	B-727-31	N908JE	PBI	HPN		7	JE, GM, ET, DP, FLEUR PERRYMAN, GIL GURLY, ROLAN	\/	2 5		
24	"	"	HPN	PBI		8	JE, GM, BADIUROSKYKOVLV	\/	2 4		
27	"	"	PBI	HPN		9	JE, GM, BK	\/1	2 6		
29	"	"	HPN	TIST		10	JE, GM, ET, DP, BK	\/1	3 7		
30	G-1159B	N908JE	PBI	PBI			3 FLS APPROACHES SAFETY PILOT LARRY VISOSKI	3/3	6		
SEP 3	B-727-31	N908JE	TIST	HPN		11	JE, GM, ET, AT, BK, SARAH KELLEN, ALEXANDRO PERON	\/1	3 7		
6	"	"	HPN	PBI		12	JE, GM, ET, BK, 1 FEMALE		2 1		
9	"	"	PBI	HPN		13	JE, GM, ET, BK	\/	2 7		
15	"	"	HPN	PBI		14	JE, GM, ET, KAREN CASEY, LISA	\/1	2 6		
JUN 9	C-172	N1144LV	LNA	LNA			AL PETRELLA - TAXI, TAKEOFF, TURNS, CLIMBS, DESCENTS	4/4	9		
SEP 19	B-727-31	N908JE	PBI	HPN		15	JE, GM, ET	\/1	2 7		
21	"	"	HPN	CYRX		16	JE, GM, ET		2 2		
22	"	"	CYQX	LFPB		17	JE, GM, ET	/	4 9		
25	"	"	LFPB	CYQX		18	JE, ET, ED TUTTLE		5 5		
25	"	"	CYQX	HPN		19	JE, ET, ED TUTTLE		3 0		
28	"	"	HPN	PBI		20	JE, ET, PAULA EPSTEIN		2 7		
OCT 5	"	"	PBI	ABQ		21	JE, GM, SARAH KELLEN	\/1	4 0		
4	"	"	ABQ	HPN		22	JE, GM, SK, 2 FEMALE	\/	3 7		
8	"	"	HPN	JAX		23	NO PASSENGERS		2 2		

I certify that the statements made by me on this form are true.

Pilot's Signature: [signature]

	Number of Landings	AIRPLANE	GLIDER	HELICOPTER
Page Total	17/14	55 0		
Amount Forward	6450 6419	8327 6	33	12 (
Total to Date	6467 [illegible]	8382 6	3	2 [illegible]

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Date 19__ 2,002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
OCT 15	C172R	N395SP	LNA	LNA				3/3	5		
15	"	N395SP	LNA-BCT-LNA				LARRY MORRISON - BFR SATISFACTORY STALLS, MCA, STEEP TURNS, EMERGENCY LANDING	4/4	1 3		
9	B-727-31	N908JE	JAX	LCQ		24	NO PASSENGERS	1/1	5		
10	G-1159B	N909JE	PBI	TEB		1533	NO PASSENGERS	0/0	2 5		
11	"	"	TEB	PBI		1534	JE SARAH KELLEN		2 3		
15	"	"	PBI	TEB		1540	JE, GM, SK, LARRY, STEVE, 1 FEMALE	1/	2 4		
17	"	"	TEB	BED		1541	JE, BONNIE	1/1	8		
17	"	"	BED	TEB		1542	JE, BONNIE		1 0		
18	"	"	TEB	TIST		1543	JE, GM, AP, SK, 2 FEMALES		3 5		
23	"	"	TIST	TEB		1544	JE, GM, AP, SK, SHERIDAN GIBSON, ALEXA WALLACE	1/1	4 0		
26	"	"	TEB	PBI		1545	JE, CT, SK, SHERIDAN GIBSON, 2 FEMALE MODELS, SHERIDAN		2 6		
30	"	"	PBI	LCQ		1546	JE, SARAH KELLEN, JULIE	1/1	1 0		
30	"	"	LCQ	TEB		1547	JE, SK, JULIE	1/1	2 0		
NOV 3	"	"	TEB	SAF		1548	JE, GM, SK	1/1	4 0		
5	"	"	SAF	ASE		1549	JE, GM, SK	1/1	8		
5	"	"	ASE	PBI		1550	JE, GM, SK	1/1	3 7		
6	"	"	PBI	CMH		1551	JE, SK BELLA WEXNER'S FUNERAL	1/1	2 4		
6	"	"	CMH	TEB		1552	JE, SK		1 4		
9	"	"	TEB	LCQ		1553	JE, AP, SK, JULIE	1/1	2 2		
							Page Total	18 16	38 9		
							Amount Forward	6467 6133	8382 6	3 3	112 6
							Total to Date	6485 [illegible]	8421 5	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000050

Date 19 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
9	G-1159B	N909JE	LCQ	PBI		1554	JE, AP, SK, JULIE	1/1	1 0		
12	"	"	PBI	TEB		1555	JE, GM, AP, JOEL PASHCOW, JULIE SHAY	1/	2 5		
15	"	"	TEB	PBI		1556	JE, GM, SARAH KELLEY, MCLINDON + 1 FEMALE		2 5		
17	B-727-31	N908JE	LGQ	PBI		25	REPOSITION FROM PAINT (JEMCO)	1/1	0 9		
18	"	"	PBI	CYQX		26	JE, GM, SK	1/	4 3		
18	"	"	CYQX	LFPB		27	JE, GM, SK	/1	4 9		
23	"	"	LFPB	LIML		28	JE, GM, SK	1/1	1 2		
23	"	"	LIML	LIPR		29	JE, EDWARDO	1/1	8		
23	"	"	LIPR	LIML		30	JE, EDWARDO	1/1	9		
24	"	"	LIML	EGGW		31	JE, GM, SK		1 7		
26	"	"	EGGW	HPN		32	JE, GM, SK		7 9		
30	"	"	HPN	PBI		33	JE, SK, GWENDOLYN BECK, JOEL PASHCOW, KAREN CASEY	1/	2 5		
DEC 4	"	"	PBI	ISP		34	JE, SK	1/	2 5		
4	"	"	ISP	PBI		35	JE, AP	1/	2 7		
9	"	"	PBI	TIST		36	JE, GM, AP, 1 FEMALE	1/	2 2		
13	"	"	TIST	HPN		37	JE, GM, SK, AP, LEON TINTAY, CRISTALLE WASCHE, CHAUN TAGHAVI	1/	4 0		
15	"	"	HPN	CMH		38	JE, SHELLEY LEWIS, 2 FEMALES, 1 MALE	1/	1 5		
16	"	"	CMH	PBI		39	JE		2 1		

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	AIRPLANE	GLIDER	HELICOPTER	
Page Total	7/6	23 6			
Amount Forward	6485 / 6149	8421 5	3 3	112	6
Total to Date	6492 / 6155	8450 1	3 3	112	4

Date 2003 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
4	C-421B	N908GM	ZORRO	SAF			JOSH LANNY, 2 MEN (ITALIAN PAINTERS)	1/1	5		
4	"	"	SAF	ZORRO			JOSH LANNY, 2 MEN ITALIAN PAINTERS	1/1	5		
4	"	"	ZORRO	ZORRO			LARRY VISOSKI TAKING PICTURES OF JE'S + LV HOUSE	1/1	5		
30 DEC	B-727-31	N908JE	HPN	PBI		33	JE, SK, GB, JP, KC	1/	2 5		
4	"	"	PBI	ISP		34	JE, SK	1/	2 5		
8	"	"	ISP	PBI		35	JE, AP	1/	2 7		
9	"	"	PBI	TIST		36	JE, GM, AP, 1 FEMALE	1/	2 2		
13	"	"	TIST	HPN		37	JE, GM, SK, AP, GT, CW, CP	1/	4 0		
15	"	"	HPN	CMH		38	JE, SL, 2 FEMALES 2 MALES	1/	1 5		
16	"	"	CMH	PBI		39	JE		2 1		
17	"	"	PBI	TIST		40	JE, GM, SK, 1 FEMALE	1/1	2 6		
26	"	"	TIST	TLPL		41	JE, GM, SK, AP, FLEUR PERRY LANE BOB BREEZY	1/1	1 1		
26	"	"	TLPL	PBI		42	JE, GM, SK, AP, FLEUR PERRY LANE BOB BREEZY	D/O	3 6		
30	"	"	PBI	TIST		43	JE, GM, AP, SK, 1 FEMALE		2 4		
2004 JAN 6	"	"	TIST	EWR		44	JE, GM, SK, AP, ALEXIA WALLABY, CINDY LOPEZ	1/	4 1		
11	"	"	EWR	PBI		45	JE, GM, ROGER, WARREN, MARGARET, 1 FEMALE	1/1	2 6		
13	G-1159B	N909JE	PBI	MBPV		1557	JE, GM	1/1	1 5		
13	"	"	MBPV	PBI		1558	JE, GM		1 7		
14	B-727-31	N908JE	PBI	LGA		46	JE, GM	1/	2 2		

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	15	40 8		
Amount Forward	6492 6155	8450 1	3 3	112
Total to Date	6507	8490 9	3 3	112

Date 19 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
JAN 15	B-727-31	N908JE	LGA	BED		47	JE	✓1	7		
15	"	"	BED	HPN		48	JE, JESSICA		8		
17	"	"	HPN	TIST		49	JE, GM, SK, AP, CINDY LOPEZ, JOANNE, 1 FEMALE		3 4		
20	"	"	TIST	PBI		50	JE, GM, SK, AP, CINDY LOPEZ, JOANNE, [illegible] ALEXANDER, STACEY [illegible]	✓1	2 6		
22	"	"	PBI	HPN		51	JE, GM, SK, AP, CINDY LOPEZ, JOANNE	✓	2 5		
25	"	"	HPN	PBI		52	JE, GM, SK, AP, ALBERTO PINTO, YVES PICK ARDT, STEVE SHOLDMAN, 3 FEMALES		2 7		
27	"	"	PBI	TIST		53	JE, GM, AP, SK, ED TUTTLE, 1 MALE, 1 FEMALE	✓	2 4		
30	"	"	TIST	JFK		54	JE, GM, SK, AP, ED TUTTLE, CINDY LOPEZ	✓	3 7		
FEB 5	"	"	JFK	PBI		55	JE, GM, SK, AP, 1 MALE, 1 FEMALE	✓1	2 8		
9	"	"	PBI	MIA		56	JE, SK, AP		7		
9	"	"	MIA	HPN		57	BILL CLINTON, 4 SECRET SERVICE, 2 MALES, 1 FEMALE, JE, GM, SK, AP		2 6		
10	"	"	HPN	LFPB		58	JE, GM, SK, AP, FLEUR PERRY LANG, MARCY LLOYD	✓1	6 5		
13	"	"	LFPB	ESSA		59	JE, SK	✓1	2 2		
14	"	"	ESSA	LIML		60	JE, SK	✓	2 4		
15	"	"	LIML	EGGW		61	JE, SK		1 8		
15	"	"	EGGW	BGR		62	JE, GM, SK		7 2		
16	"	"	BGR	PBI		63	JE, GM, SK		3 5		
18	G-1159B	N909JE	PBI	ABY		1559	JE	✓1	1 4		
18	"	"	ABY	PBI		1560	EMPTY	✓1	1 1		
							Page Total	10 7	51 0		
							Amount Forward	6507 6162	8490 9	33	112
							Total to Date	6517 6169	8541 9	33	112

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date ~~19~~ 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER
FEB 18	B-727-31	N908JE	PBI	ABY		64	JE, GM, SK, GLEN DUBEN, 2 FEMALES RICHARD COOK	✓	1	3			
18	"	"	ABY	JFK		65	JE, GM, SK, GLEN DUBEN, 2 FEMALES RICHARD COOK		2	1			
20	"	"	JFK	MRY		66	JE, SK, GERALDINE LAYBOURNE, KIT LAYBOURNE, STEVEN DRAKER, NINA + TOM ZAGAT	1/1	5	9			
~~23~~	~~"~~	~~"~~	~~MRY~~	~~VNY~~		66	DAVID ROCKWELL, CAROLYN MILLER, MICHAEL WOLF, DANIEL DENNETT, RICHARD JOHN BROCKMAN, KATRINA MATSON, CINDY, KELLY BOVINO, RICHARD COOK						
23	"	"	MRY	VNY		67	JE, SK, KELLY BOVINO, NINA + TOM ZAGAT, 6 OTHER PASSENGER	1/1		8			
23	"	"	VNY	JAX		68	B CHECK FMS, EMROUTE RADIO, PROCEDURES LARRY MORRISON S+L, T, S, R, LANDING	✓	4	2			
25	G-1159B	N909JE	~~TEB~~ PBI	ABQ ~~TEB~~		1561	ROGER, SLOANE + SPENCER BARNETTE, ARLENE (NANNY)	1/1	2	5			
25	"	"	TGB	ABQ		1562	GM	1/1	4	3			
28	B-727-31	N908JE	JAX	PBI		71	B CHECK	1/1	1	2			
MAR 6	B-727-200	SIMULATOR	MIA	MIA			STEEP TURNS, STALLS, HOLDING,		2	0			
7	"	"	"	"			EMERGENCY DESCENT, RTO, UNUSUAL ATTITUDES, ENGINE FAILURES, MISSED APPROACH		2	0			
7	"	"	"	"			EMERGENCY DESCENTS, 2 ENGINES OUT, WINDS SHEAR, HYDRAULIC FAILURES		2	0			
8	"	"	"	"			EMERGENCY DESCENT, HOLDING, ENGINE FIRE, WHEEL WELL FIRE		2	0			
10	B-727-31	N908JE	TIST	JFK		72	JE, GM, SK, AP, CINDY, 2 FEMALES	✓	4	1			
14	"	"	JFK	PBI		73	JE, SK, JOE PAGANO, JULIE, TODD		2	5			
17	"	"	PBI	JFK		74	JE, SK, JOE PAGANO, JULIE, TODD, 1 FEMALE	✓	2	6			
19	"	"	JFK	EGGW		75	BILL CLINTON, DOUG BAND, 3 SECRET SERVICE JE, GM, SK	1	6	7			
21	"	"	EGGW	JFK		76	BILL CLINTON, DOUG BAND, 10 SECRET SERVICE JE, GM, SK, NAOMI CAMPBELL, 1 MALE		7	8			
22	"	"	JFK	PBI		77	JE, NICOLE JUNKERMANN SEPARATE FOR GM		2	6			
							Page Total	~~89~~ 5	56	6			
							Amount Forward	6517 6169	8541	9	3	3	112
							Total to Date	6526	8597	5	3	3	112

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000054

Date 19__ 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
APR 1	B-727-31	N908JE	PBI	TIST		78	JE, GM, SK, AP, 2 FEMALES — SEAN KOO FOR LV	1/1	2	3				
5	"	"	TIST	PBI		79	SEAN KOO FOR LM	1/1	2	7				
5	"	"	PBI	IAD		80	SEAN KOO FOR LM		2	1				
6	"	"	IAD	PBI		81	SEAN KOO FOR LM	1/1	2	8				
8	"	"	PBI	JFK		82	JE, SK, SHELLEY LEWIS	2/1	2	5				
20	B-727-200	SIMULATOR	MIA	MIA			PREFLIGHT, TR LOSS, CSD LOW OIL PRESSURE AND DISCONNECT, START VALVE FAILURE, HOT START		2	0				
22	"	"	"	"			NO APU START, LOSS OF ALL GENERATORS, STAB TRIM RUNAWAY, MANUAL GEAR EXTENSION		2	0				
23	"	"	"	"			APU FIRE, BATTERY START, CROSSBLEED START, ENGINE FIRE, ENGINE SHUTDOWN		2	0				
24	"	"	"	"			INFLIGHT START, FUEL DUMPING, SYSTEM B LOSS, ELECTRICAL SMOKE & FIRE, SYSTEM A & B LOSS		2	0				
25	"	"	"	"			TWO GENERATORS INOPERATIVE, TWO ENGINES INOPERATIVE, ENG. FIRE, LOW OIL PRESSURE ON START		2	0				
26	"	"	"	"			YAW DAMPER FAILURE, APU FIRE, LED [illegible], LOSS OF ALL GENERATORS, ENGINE FIRE		2	0				
27	"	"	"	"			TR LOSS, LOSS OF ALL GENERATORS, SMOKE IN [illegible] CABIN, SYSTEM A LOSS, STRUCTURAL [illegible]		3	0				
29	B-727-31	N908JE	PBI	ABQ		90	JE, GM, SK — PETE ROTHGER		4	1				
MAY 2	"	"	ABQ	JFK		91	JE, GM, SK	1/	3	2				
4	"	"	JFK	PBI		92	JE, SHELLEY LEWIS	1/1	2	4				
	TOTALS				REPORTED				TO					
							Page Total	8/5	36	6				
							Amount Forward	6520 / 6175	8598	5	3	3	112	6
							Total to Date	6553 / 6186	8635	1	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
JAN 21	N908GM	C-421B	PBI	FXE			D.O. AT BROTHERS DURATION TO HAVE ENGINES SET UP	1/1	6		
MAY 11	N908JE	B-727-31	PBI	JFK		93	JE, SK	1/1	2 5		
11	B-727-31	N908JE	JFK	LFPB		94	JE, GM, SK	1/1	7 2		
13	"	"	LFPB	LFPG		95	REPOSITION		5		
13	"	"	LFPG	EGGW		96	JE, GM, SK		8		
16	"	"	EGGW	LFMN		97	JE, GM, SK	1/1	1 8		
19	"	"	LFMN	UNNT		98	JE, GM, SK	1/	6 7		
20	"	"	UNNT	RJTA		99	JE, GM, SK RATHGEB	1/1	6 5		
22	"	"	RJTA	VHHH		100	JE, GM, SK, PRESIDENT BILL CLINTON, MEVE, DOUG BANDS, JANELLE, JESSICA HOPPER		4 0		
23	"	"	VHHH	ZGSZ		101	SAME AS ABOVE PETE RATHGEB		4		
23	"	"	ZGSZ	WSSS		102	SAME AS ABOVE PETE RATHGEB		3 4		
25	"	"	WSSS	VTBD		103	SAME AS ABOVE PETE RATHGEB		2 2		
25	"	"	VTBD	WBSB		104	SAME AS ABOVE PETE RATHGEB		2 6		
27	"	"	WBSB	WRRR		105	JE, GM, SK PETE RATHGEB	1/1	2 1		
29	"	"	WRRR	VCBI		106	JE, GM, SK PETE RATHGEB		5 2		
29	"	"	VCBI	OMDB		107	JE, GM, SK PETE RATHGEB		4 4		
30	"	"	OMDB	LFPB		108	JE, GM, SK PETE RATHGEB		3 8		
31	"	"	LFPB	EGGW		109	JE, GM, SK PETE RATHGEB	1/1	1 0		
JUN 7	"	"	EGGW	EIDW		110	REPOSITION		1 7		
							Page Total	6/7	57 4		
							Amount Forward	6533 / 4180	8635 1	33	112 6
							Total to Date	6539			

I certify that the statements made by me on this form are true.

(signature)

CONFIDENTIAL DR_000056

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER	HELICOPTER
JUN 8	B-727-31H	N908JE	EIDW	JFK		111	JE, GM, SK	1/1	6	9		
8	"	"	JFK	PBI		112	JE, SK	1/	2	3		
12	G-1159B	N909JE	PBI	PBI		1567	GMU FLIGHTS - SEAN RILEY, GREG CARPENTER	1/1	2	7		
14	B-727-31H	N908JE	PBI	BOS		113	REPOSITION		2	6		
14	"	"	BOS	TIST		114	JE, SK, CINDY LOPEZ, LAURA HARRIS		3	7		
16	"	"	TIST	JFK		115	JE, GM, SK, CINDY LOPEZ, LAURA HARRIS	1/	3	8		
19	G-1159B	N909JE	PBI	TEB		1568	REPOSITION — PETE RATHGEB	1/1	3	2		
19	"	"	TEB	PBI		1569	JE, GM, SK, CINDY LOPEZ — PETE RATHGEB		2	5		
21	"	"	PBI	MYEF		1570	JE, GM, SK, CL, JEAN LUC BRUNEL, VIRGINIA ROBERTS — PETE RATHGEB	1/1	1	1		
21	"	"	MYEF	PBI		1571	REPOSITION — PETE RATHGEB	0/0	1	2		
23	"	"	PBI	MYEF		1572	REPOSITION — PETE RATHGEB	0/0	1	1		
23	"	"	MYEF	TEB		1573	JE, GM, SK, CL, JULIANA BORGES, JEAN LUC BRUNEL / MELISSA STAHL — PETE RATHGEB	1/1	2	9		
23	"	"	TEB	PBI		1574	REPOSITION — PETE RATHGEB		2	5		
27	B-727-31H	N908JE	JFK	LFPB		116	JE, GM, SK, AP, FREDERIC FEKKAI, ALEXANDRE FEKKAI, ISER ENG YANGKEY, LAETITIA SENAUD, DANA LYNN PRECEE, DR. HENRY JARECKI, NICHOLAS JARECKI, JULIE-CLAIRE BEUGIN, ANNE KAREN FOGLE, JEAN LUC BRUNEL, ALEXI WALLACE, AMANDA UNGARO	/1	7	1		
29	"	"	LFPB	LFTH		117	SAME AS 116		1	3		
JUL 10	"	"	LFTH	LFPB		118	JE, JULIE CONCEPCION	1/1	1	5		
13	"	"	LFPB	LFMN		119	JE	0/0	1	2		
							Page Total	8/7	47	6		
							Amount Forward	6539 / 6187	8692	5	33	112 6

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
JUL 13	B-727-31H	N908JE	LFMN	GMTT		120	JE, GM, SK, AP, CINDY LOPEZ		2	1				
13	"	"	GMTT	GMME		121	JE, GM, SK, CL, AP			7				
13	"	"	GMME	LPAZ		122	JE, GM, SK, AP, CL, PRESIDENT CLINTON DOUG BANDS, MIKE, & SECRET SERVICE		2	4				
13	"	"	LPAZ	JFK		123	JE, GM, SK, AP, CL, PRESIDENT BILL CLINTON, DOUG BANDS, MIKE, & SECRET SERVICE		5	8				
18	"	"	JFK	PBI		124	JE, SHELLEY LEWIS, 2 FEMALES		2	2				
19	"	"	PBI	JAX		125	KRISTY RODGERS, GREG HOLBERT, ALYSSA HOLBERT — C CHECK		1	0				
AUG 4	G-1159B	N909JE	PBI	MVY		1583	JE, 1 FEMALE		2	8				
4	"	"	MVY	BED		1584	JE, 1 FEMALE			7				
4	"	"	BED	TEB		1585	JE, 1 FEMALE			9				
5	"	"	TEB	SAF		1586	JE, SK, 2 FEMALES	1/1	3	9				
6	C-172XP	N7395P	AEG	AEG			172 CHECK OUT	3/3		9				
6	206L3	N474AW	ZORRO	AEG										
15	B-727-31H	N908JE	JAX	JAX		126	C-CHECK FLIGHT TEST PETE RATHGEB	1/1		9				
16	"	"	JAX	PBI		127	RETURN FROM C-CHECK PETE RATHGEB		1	1				
17	G-1159-B	N909JE	SAF	TEB		1589	JE, GM, SK, CINDY LOPEZ, VIRGINIA ROBERTS, DAN [illegible], EDUARDO, ALFREDO, MARGARITA, NICK SIMMONS		3	7				
18	"	"	TEB	PBI		1590	JE VIRGINIA ROBERTS, 1 FEMALE		2	4				
21	B-727-31H	N908JE	PBI	TIST		128	JE, SHELLEY LEWIS		2	5				
25	"	"	TIST	JFK		129	JE, SK	1/1	3	6				
28	"	"	JFK	LFPB		130	JE, SK, CINDY LOPEZ, 1 FEMALE		6	4				
							Page Total	6/6	44	0				5
							Amount Forward	6547 6194	8740	1	3	3	112	6

I certify that the statements made by me on this form are true.

[signature]

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
AUG 31	B-727-31H	N908JE	LFPB	EGBB		131	JE, NICOLE JUNKERMANN	1/1	1 0		
SEP 2	"	"	EGBB	LFPB		132	JE, NICOLE JUNKERMANN		1 0		
3	"	"	LFPB	JFK		133	JE, SK, CINDY LOPEZ, JEAN LUC BRUNEL	1/1	7 5		
4	"	"	JFK	PBI		134	JE, 1 FEMALE		2 5		
8	G-1159B	N909JE	PBI	TEB		1592	JE, ANDREA, 2 FEMALES		2 7		
9	G-1159B	"	TEB	BED		1593	JE, SHELLEY LEWIS	1/1	9		
9	"	"	BED	TEB		1594	JE, SHELLEY LEWIS		9		
10	"	"	TEB	TIST		1545	JE, SHELLEY LEWIS, ANDREA, 1 MALE		3 8		
15	"	"	TIST	PBI		1846	JE, SK, DIANE FLEETWOOD	1/1	2 6		
21	B-727-31H	N908JE	JFK	LPAZ		136	PRESIDENT WILLIAM J. CLINTON, SECRET SERVICE, KEVIN SPACEY, CHRIS TUCKER, JE, GM,	/	5 2		
22	"	"	LPAZ	DGAA		137	SK, CL, CHAUNTAE DAVIES, ANDREA MITROVICH, DOUG BAND, DAVID SLANG, JIM KENNEDY,	/	5 7		
23	"	"	DGAA	DNAA		138	ERIC NONACS, RODNEY SLATER, CASEY + LAURA WASSERMAN, RON BURKLE, GAYLE SMITH	0/	1 7		
24	"	"	DNAA	HRYR		139	SAME AS ABOVE LESS RON BURKLE		4 0		
25	"	"	HRYR	FQMA		140	SAME AS ABOVE PLUS IRA MAGAZINER		3 3		
26	"	"	FQMA	FACT		141	SAME AS ABOVE	1/	2 4		
27	"	"	FACT	FAJS		142	SAME AS ABOVE LESS JE, GM, SK, CL, CHAUNTAE DAVIES, ANDREA MITROVICH		2 1		
28	"	"	FAJS	FACT		143	SAME AS ABOVE LESS GAYLE SMITH, IRA MAGAZINER		2 0		
29	"	"	FACT	DGAA		144	SAME AS ABOVE ADD, JE, GM, SK, CL, CD, AM		6 2		
29	"	"	DGAA	LFPB		145	SAME AS ABOVE	/1	6 5		
							Page Total	5/6	62 5		
							Amount Forward	6553 6200	8784 1	33	113
							Total to Date	6558 6266	8846 6	33	113

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Heli
29	B-727-31H	N908JE	LFPB	EGGW		146	SAME AS ABOVE LESS JE, SK, CD, LAURA + CASEY WASSERMAN	1/1	9		
OCT 1	"	"	EGGW	LFPB		147	GM, NICK + EDWINA SIMMONDS		1 0		
2	"	"	LFPB	JFK		148	JE, GM, SK, CL, AND REA METROUEZ, NAOMI CAMPBELL		8 1		
3	"	"	JFK	PBI		149	JE, SK, ANDREA METROUEZ, NICK SIMMONDS, CHECK, [illegible]		2 4		
6	G-1159B	N909JE	PBI	TEB		1597	JE, SK, ANDREA, [illegible], FEMALE		2 3		
11	"	"	TEB	PBI		1598	JE, GM, ANDREA, RYAN, STAFF		2 5		
14	"	"	PBI-OFF-PBI			1599	MARK POTTER - PPC ILS SINGLE ENGINE + GO AROUND SE	1/	8		
15	"	"	PBI	TEB		1600	JE, GM, ANDREA METROUEZ, RYAN DEONNE	1/1	2 4		
17	"	"	TEB	TIST		1601	JE, SK, ANDREA METROUEZ		3 7		
21	"	"	TIST	PBI		1602	JE, SK, AM, ANNA HAYES, JULIETTE BRYANT	1/1	2 6		
30	"	SIMULATOR	JFK	MIV 65 SAN			STEEP TURNS, STALLS, SLOW FLIGHT, REJECTED TAKEOFF, HOLDING		2 0		
30	"	"	MIV	JFK 8 SAN			SINGLE ENGINE APPROACH + GO AROUND, EMERGENCY DESCENT, ELEC., ELECTRICAL		2 0		
31	"	"	SWF	JFK 5 SAN			ENGINE FIRE, SINGLE ENGINE APPROACH, DOUBLE ENGINE FAILURE, [illegible]	3/3	2 0		
NOV 3	"	N909JE	PBI	TIST		1603	JE, SK, ANDREA METROUEZ	1/1	2 3		
6	B-727-200	SIMULATOR	MIA	MIA [illegible]			DOUBLE ENGINE FAILURE, LOSS OF ALL GENERATORS, EMERGENCY DESCENT, SYS. [illegible]		2 0		
6	"	"	MDA	MIA			[illegible] LOW OIL PRESS [illegible], HIGH PRESS TEMP, ENGINE FIRE, LOSS OF ALL GENERATORS	CHECK RIDE	2 0		
10	G-1159B	N909JE	TIST	TEB		1604	JE, SK, KELLY MCCARTHY, MA, [illegible]		4 3		
15	"	"	TEB	TIST		1605	JE, GM, RYAN DEONNE, [illegible]		3 6		
15	"	"	TIST	PBI		1606	REPOSITION		2 6		
							Page Total	4/3	49 5		
							Amount Forward	6558 / 6206	5846 6	3 3	1 1 3

I certify that the statements made by me on this form are true.

[signature]

Date 19__ 20__	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... [illegible]		[illegible]		[illegible]
NOV 18	B-727-31H	N908JE	PBI	TIST		152	REPOSITION	1/1	2	4			
18	"	"	TIST	LPAZ		157	JE, GM, SK, ANDREA MITROVITCH, RYAN DENNING, ED TUTTLE		5	6			
19	"	"	LPAZ	LFPB		158	JE, GM, SK, ANDREA MITROVITCH, RYAN DENNING, ED TUTTLE	1/1	4	1			
22	"	"	LFPB	EKCH		159	JE, SK, JEAN LUC BRUNEL, ANDREA MITROVITCH		1	8			
22	"	"	EKCH	UUWW		160	JE, GM, SK, ANDREA MITROVITCH		2	5			
24	"	"	UUWW	ULLI		161	JE, GM, SK, ANDREA MITROVITCH	1/1	1	4			
24	"	"	ULLI	EINN		162	JE, GM, SK, ANDREA MITROVITCH		3	6			
24	"	"	EINN	JFK		163	JE, GM, SK, ANDREA MITROVITCH		3	6			
26	"	"	JFK	PBI		164	JE, SK, RYAN DENNING, MICHAEL LIEBMANN, [illegible] TODD		2	7			
DEC 1	"	"	PBI	JFK		165	JE, GM, SK, ET, MICHAEL LIEBMANN, RYAN DENNING, TODD, 2 MALES, 4 FEMALES		2	5			
5	"	"	JFK	PBI		166	JE, SK, MICHAEL LIEBMANN, 2 FEMALES		2	3			
9	"	"	PBI	TIST		167	JE, GM, SK, RYAN DENNING, MICHAEL LIEBMANN, 2 FEMALES	1/1	2	4			
15	"	"	TIST	PBI		168	JE, GM, SK, ET, CHANTAL [illegible] AMBASSADOR [illegible], [illegible]		2	5			
21	G-1159B	N909JE	PBI	ABY		169	JE, GARY ROXBURGH	1/1	1	2			
21	"	"	ABY	PBI		169	JE, GARY ROXBURGH		1	1			
23	"	"	PBI	TIST			JE, GM, SK, RYAN DENNING, MICHAEL LIEBMANN, GARY ROXBURGH	1/1	2	3			
2,003 2 JAN	"	"	TIST	PBI			JE, GM, SK, RYAN DENNING, [illegible] BURCH, MICHAEL LIEBMANN, [illegible]	1/1	2	8			
6	"	"	PBI	TEB			JE, GM, SK, VALSAN		2	9			
9	"	"	TEB	PBI			JE, SK, VALSAN		2	4			
							Page Total	7/6	53	1			
							Amount Forward	6567 / 6214	8896	1	3	3	113
							Total to Date	6574 / [illegible]	8949	2	3	3	113

I certify that the statements made by me on this form are true.

[signature]

Date 19__ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELI[COPTER]
JAN 11	[illegible]-1159B	N909JE	PBI	PBI			TEST FLIGHT - SMOKE IN CABIN			5			
13	B-727-31H	N908JE	PBI	JFK			JE, GM, SK, MAGALI BLACHON, VALSAN MELVIGEL LIEFMANN, ANDREA MITROVITCH	✓	2	2			
17	"	"	JFK	PBI			JE, GM, SK, MICHAEL LIEFMANN, RYAN DENNING, JEAN LUC BRUNEL		3	1			
22	"	"	PBI	TIST		171	JE, GM, SK, MAGALI BLACHON, RYAN DENNING, MICHAEL LIEFMANN,	✓	2	2			
25	"	"	TIST	PBI		172	JE, GM, SK, RYAN DENNING, MICHAEL LIEFMANN		2	8			
26	"	"	PBI	JAX		173		✓1		9			
26	G-1159B	N909JE	PBI	TEB		164	JE, SK, MICHAEL LIEFMANN, RYAN DENNING, MAGALI BLACHON, GARY ROXBURGH	✓	2	5			
31	"	"	TEB	PBI		165	JE, SK, MAGALI BLACHON, MICHAEL LIEFMANN, GARY ROXBURGH		2	6			
Feb 1	B-727-31H	N908JE	JAX	PBI		174	PETE RATHGEB	✓1	1	0			
3	"	"	PBI	JFK		175	JE, GM, SK, MICHAEL LIEFMANN, MAGALI BLACHON		2	3			
7	"	"	JFK	PBI		176	JE, SK, MAGALI BLACHON, MICHAEL LIEFMANN	1✓1	2	8			
11	"	"	PBI	TIST		177	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIN, MICHAEL LIEFMANN		2	5			
12	"	"	TIST	LEGR		178	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIN, MICHAEL LIEFMANN, [illegible]	✓1	7	2			
13	"	"	LEGR	LFPB		179	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIN, MICHAEL LIEFMANN	✓1	2	2			
17	"	"	LFPB	CYQX		180	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIN, JULIETTE BRYANT, DEBORAH AMSELEM, MICHAEL LIEFMANN		5	5			
17	"	"	CYQX	PBI		181	JE, GM, SK, MAGALI BLACHON, MICHAEL LIEFMANN, PATRICK OCHIN, JULIETTE BRYANT, DEBORAH AMSELEM		5	5			
23	"	"	PBI	JFK		182	JE, DEBORAH AMSELEM, JULIETTE BRYANT, MICHAEL LIEFMANN	✓1	2	8			
25	"	"	JFK	MRY		183	JE, SK, CHAUNTAE DAVIES, DEAN KAMEN + 1 PAX		6	3			
							OMITTED LOGBOOK ENTRIES	109/109	11	0			
							Page Total	116/115	65	0			
							Amount Forward	6574 6210	8444	2	9	3	113
								6690	[illegible]				

I certify that the statements made by me on this form are true.

[illegible signature]

Date 19__ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER
FEB 28	B-727-31H	N908JE	MRY	ABQ		184	JE, GM, SK, EMMY TAYLER, BRENT MAGALI BLACHON		1	8	+o		
MAR 4	"	"	ABQ	JFK		185	JE, GM, SK, GT, MAGALI BLACHON JULIETTE BRYANT		3	5			
5	"	"	JFK	PBI		186	JE, MAGALI BLACHON		2	8			
12	B-727-200	FLIGHT SERVICE SIMULATOR	MIA	LCL			HOLDING		2	5			
12	"	"	"	"					2	5			
13	"	"	"	"					2	5			
13	"	"	"	"					2	5			
17	G-1159B	N909JE	PBI	TEB			JE, GM, SK, MICHAEL LIEFMANN, MAGALI BLACHON, BRENT		2	4			
19	"	"	TEB	BED		Ø1	JE	1/1	1	0			
19	"	"	BED	TEB			JE		1	1			
20	"	"	TEB	PBI			JE, GM, SK, PRESIDENT ANDRES PASTRANA MICHAEL LIEFMANN, JEAN LUC BRUNEL		2	8			
21	"	"	PBI	MYNN			JE, GM, SK, PRESIDENT ANDRES PASTRANA, JEAN LUC BRUNEL	1/1	1	0			
23	"	"	MYNN	PBI		1625	JE, GM, SK, JEAN LUC BRUNEL			8			
25	B-727-31H	N908JE	PBI	JFK		187	JE, GM, JEAN LUC BRUNEL, SK MICHAEL LIEFMANN		2	5			
27	"	"	JFK	TIST		188	JE, SK, CINDY LOPEZ, MAGALI BLACHON BRENT TINDALL		3	3			
APRIL 2	"	"	TIST	SBGR		189	JE, GM, SK, JEAN LUC BRUNEL, MAGALI BLACHON, NAOMI CAMPBELL		6	4			
5	"	"	SBGR	GVAC		190	JE, GM, SK, JEAN LUC BRUNEL MAGALI BLACHON		6	2			
6	"	"	GVAC	LFPB		191	JE, GM, SK, JEAN LUC BRUNEL MAGALI BLACHON	1/1	5	2			
16	"	"	LFPB	CYQX		192	JE, GM, SK, MICHAEL LIEFMANN EVELYN BOULET, SVETLANA GRIBZNOVE		5	4			
							Page Total	3/3	56	2			
							Amount Forward	6690 6335	9015	2	3	3	113
							Total to Date	6693 6338	9071	4	3	3	113

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2003	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane		Glider		Helicopter	
APRIL 10	B-727-31H	N908JE	CYQX	PBI		193	JE, GM, EVELYN BOULET, MELANIE LEEMAN SK, SVETLANA GRIAZNOVE		5	2				
13	G-1159B	N969JE	CMH	TEB		1627	LM, JE, ML, SK, BT [BARRY MASSEY]		1	2				
13	"	"	PBI	CMH		1628	LM, JE, ML, SK, BT [BARRY MASSEY]	1/1	2	2				
14	"	"	TEB	MIV		1628	LM [BARRY MASSEY]			8				
16	"	"	MIV	TEB		1629	[BARRY MASSEY]			8				
17	"	"	TEB	PBI		1630	JE, SK, BT, GM CINDY LOPEZ, ANDREA MITROVITCH [BARRY MASSEY]		2	4				
21	"	"	PBI	ADS		1631	JE, SK, BT, CL	1/1	2	8				
21	"	"	ADS	SAF		1632	JE, CL, SK, BT	1/1	1	6				
24	"	"	SAF	SBA		1633	JE, SK, TEALA DAVIES, DIANE		2	0				
24	"	"	SBA	VNY		1634	JE SK, CHAUNTAE DAVIES, DIANE KELLY BOVENA, EMMY TAYLOR			6				
26	"	"	VNY	TEB		1635	JE, SX	1/	4	8				
MAY 3	"	"	TEB	IAD		1636	ANDREA MITROVITCH, SK, BT			9				
3	"	"	IAD	PBI		1637	JE, AM, SK, BT		2	1				
7	BHT-407	N407BP	BELLSCHOOL	HURST, TX			PEDAL TURNS, QUICK-STOP, NO HYDRAULICS HOVER AUTOS, SLOPES						1	3
7	"	"	"	"			AUTOROTATION, 180 AUTOROTATION, NO HYDRAULICS, HOVER AUTOS						1	2
8	"	"	"	"			AUTOROTATIONS, 180 AUTOROTATIONS, NO HYDRAULICS, AUTO HOVERS						1	5
9	"	N400DY	"	"			AUTOROTATION 180 AUTOROTATION, NO HYDRAULICS, HOVER AUTO, [illegible]						1	0
12	"	N491GM	TIST	TIST			LARRY VISOSKI							4
12	B-727-31H	N908JE	TIST	JFK		195	JE, AM, SK, BT, TEALA DAVIES, TATIANA ESPINOSA, GABRIANA PACHECO		3	7				

I certify that the statements made by me on this form are true.

	Number of Landings	Airplane		Glider		Helicopter	
Page Total	4/3	31	1			5	4
Amount Forward	6693 6339	9071	4	3	3	113	1
Total to Date	6697 [illegible]	9[illegible]	[illegible]	3	3	[illegible]	[illegible]

Pilot's Signature: David Rodgers

Date 19 2003	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane		Glider	Helicopter
MAY 20	B-727-31H	N908JE	LIRA	LEMD		198	JE, AM, JEAN LUC BRUNEL, GM, SK [PETE RATHGEB]		2	2		
21	"	"	LEMD	JFK		199	JE, JEAN LUC BRUNEL [PETE RATHGEB]		7	6		
22	"	"	JFK	PBI		200	JE, JEEC PASIKOW, TOPH MEISTER BRENT TINDALL	1/1	2	6		
26	G-1159B	N909JE	PBI	TEB		1638	JE, BT, JULIE	1/	2	5		
30	"	"	TEB	TIST		1639	JE, AM, SK, BT		4	6		
JUN 4	"	"	TIST	TEB		1640	JE, AM, SK, BT	1/1	3	8		
4	B47-467	N491GM	TIST	TIST			JE, AM, SK, VALDSONE O'BRIEN					
7	G-1159B	N909JE	TIST	PBI		1641	JE, AM, SK, VC		2	5		
11	"	"	PBI	TEB		1642	JE, AM, SK	1/1	2	6		
14	"	"	TEB	CYUL		1643	JE, DOUG BAND, GM		1	2		
14	"	"	CYUL	PBI		1644	JE, DOUG BAND, GM		3	0		
17	B-727-31H	N908JE	PBI	MYNN		201	JE, AM, VC, SK [BOB BROWN]			8		
17	"	"	MYNN	JFK		202	JE, AM, GM, SK, VC [BOB BROWN]		2	6		
29	"	"	TIST	JFK		206	JE, BT, SUSAN HAMBLIN, [illegible]		3	8		
JUL 2	"	"	JFK	PBI		267	JE, BT, FABRIZ AMG PACHECO [illegible], SK, SH	1/	2	4		
7	G-1159B	N909JE	PBI	TEB		1645	JE, BT, FP, SK, SH	1/1	2	6		
11	"	"	TEB	PBI		1646	JE, AM, SH	0/0	2	4		
14	"	"	PBI	TEB		1647	JE, AM, BT, SH, MACKLA	1/1	2	5		
14	"	"	TEB	MIV		1648		1/1		8		
							Page Total	8/6	49	9		
							Amount Forward	6697 / 6341	9102	5	33	118
							Total to Date	6705 / 6347	9152	4	33	118

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date 19__ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
JUL 31	B-727-31H	N908JE	JFK	PBI		215	JE, SK, MYLENE, BT, AM [PETER ROTHBERG]	✓	2 5		
AUG 4	"	"	PBI	TIST		216	JE, BT, AM, GM, SK [GARY ROXBURGH]	1/1	2 4		
4	BH#407	N491GM	LSJ	TIST				0/0			
5	"	"	TIST-LSJ-TIST								
10	B-727-31H	N908JE	TIST	JFK		217	JE, AM, BT, GM, CL, CATHERINE DORBY, MYLENE, [GARY ROXBURGH]	1/1	3 8		
10	"	"	JFK	PBI		218	[GARY ROXBURGH]		2 5		
13	G-1159B	N909JE	MIV	TEB		1649	~~[crossed out]~~	1/1	9		
13	"	"	TEB	SAF		1650	JE, AM, BT, GM	✓	3 8		
20	"	"	SAF	ASE		1651	JE, SK, GM		8		
20	"	"	ASE	TEB		1652	JE, GM, SK		3 8		
22	"	"	TEB	PBI		1653	JE, GM, SK, TM	1/	2 3		
31	B-727-31H	N908JE	PBI	JAX		219			9		
31	G-1159B	N909JE	PBI	TEB		1654	JE, BT, GM, SH,		2 5		
31	"	"	TEB	TEB		1655			3		
SEP 16	"	SIMULATOR	LGB	LGB			HOLDING JACK KEARLY-SIM INST. [CHRIS GAMBLE]	✓	4 0		
17	"	"	LGB	LGB			HOLDING PETER RUX... -CAND [CHRIS GAMBLE]		4 0		
18	"	"	LGB	LGB			[CHRIS GAMBLE]	4/4	4 0		
22	"	N909JE	PBI	TIST		1662	JE, BT, NADIA, SK, SH, TD	1/1	2 6		
26	B-727-200	SIMULATOR	MIA	MIA			DAVE SAVAGE-INSTRUCTOR		2 0		
							Page Total	12 8	43 1		
							Amount Forward	6705 6347	9152 4	33	118 1
							Total to Date	6717	9195 5	33	119 1

I certify that the statements made by me on this form are true.

(i) [signature]

Date 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICO[illegible]
SEP 26	B-727-200	SIMULATOR	MIA	MIA			RCY DAR2ANJ- EXAMINER		2 0		
9/27	C-172	N5279X	LNA	LNA			Dalton - Safety Check [illegible] 09/27	3/3	5		
27	"	"	"	"			ED AMATO - EXAMINER	2/2	8		
29	G-1159B	N909JE	PBI	TEB		1664	GM		2 4		
30	"	"	TEB	PBI		1665	AM, FRAN, PAULA EPSTEIN		2 6		
OCT 1	"	"	PBI	TEB		1666	JE, AM, SK, TP, VC	V1	2 5		
2	BHT-407	N491GM	PBI	MYNN			LARRY VISOSKI				1
2	BHEF407	N491GM	MYEF	MBPV			LV				2
3	"	"	MDPP	MDPC			LV				1
3	"	"	TIST	TIST			LV				
3	G-1159B	N909JE	TEB	PBI		1667	JE, NADIA, SK, TP		2 6		
6	"	"	PBI	BED		1668	JE, NADIA, TP	1/1	2 8		
7	"	"	BED	TEB		1669	JE, SH		1 0		
11	"	"	TEB	PBI		1670	JE, BT, GM, TD, CAROLINA	1/1	2 7		
14	"	"	PBI	TEB		1671	JE, BT, GM, SK,		2 5		
16	"	"	TEB	PBI		1672	JE, BT, AM, SK		2 6		
19	"	"	PBI	TEB		1673	JE, AM, BT, SK, JERRY GOLDSMITH — GARY REXBURG	1/1	2 7		
21	"	"	TEB	MTN		1674	JE, SK — GARY REXBURG	1/1	7		
21	"	"	MTN	TIST		1675	JE, BT, SK, [illegible] — GARY REXBURG	1/	3 6		
							Page Total	11/10	32 0		5
							Amount Forward	6717 / 6355	9195 5	3 3	119 7
							Total to Date	6728 / 6365	9227 5	3 3	125 0

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date ~~19~~ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
OCT 26	G-1159B	N909JE	TIST	TEB		1676	JE, BT, SK, TO, LC		3 9		
26	"	"	TEB	MIV		1677			9		
27	B-727-31H	N908JE	JAX	JAX		220		1	1 4		
28	"	"	JAX	PBI		221			1 0		
30	"	"	PBI	JFK		222			2 5		
30	"	"	JFK	LFPB		223	JE, AM	1	6 9		
NOV 4	"	"	LFPB	EBBR		224	JE, AM, SK		9		
4	"	"	EBBR	ENGM		225	JE, AM, DOUG BAND GM, 4 SECRET SERVICE PRESIDENT BILL CLINTON, SK		1 8		
4	"	"	ENGM	ESSA		226	JE, AM, GM, SK		9		
5	"	"	ESSA	ENGM		227	JE, AM, GM, SK	1/1	9		
5	"	"	ENGM	UNNT		228	JE, AM, GM, SK, DOUG BAND, 4 SECRET SERVICE PRESIDENT BILL CLINTON	1	5 3		
6	"	"	UNNT	VHHH		229	JE, AM, GM, SK, DOUG BAND, 4 SECRET SERVICE PRESIDENT BILL CLINTON	1	6 5		
9	"	"	VHHH	ZUUU		230	JE, AM, GM, SK, DB, IRA MAGAZINER PRESIDENT BILL CLINTON, 4 SECRET SERVICE		2 4		
9	"	"	ZUUU	ZBAA		231	JE, AM, GM, SK, DB, IM, [illegible] TUNG, JUSTIN COOPER PRESIDENT CLINTON, DOC RUBIN, ROB BISHOP, ~~[illegible]~~, DOC NEWSON, SCOTT ROEBER 4SS		2 2		
11	"	"	ZBAA	PANC		232	JE, AM, SK	1	7 8		
11	"	"	PANC	JFK		233	JE, AM, SK	1/1	6 3		
14	"	"	JFK	PBI		234	JE, BT, SK, ANDREA, LC		2 5		
18	"	"	PBI	JFK		235	JE, BT, SK, LC	1	2 6		
21	"	"	JFK	CMH		236	JE, SK		1 5		
							Page Total	6/4	58 2		
							Amount Forward	6728 6365	9227 5	3 3	125 6
							Total to Date	6734 6369	9285 7	3 3	125 0

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
NOV 21	B-727-31H	N908JE	CMH	TIST		237	JE, SK		3	7				
22	"	"	TIST	PBI		238	JE, SK, NICK CAMBRO, CHRIS CAMBRO, TOM PAYETTE	1/	2	7				
23	"	"	PBI	JFK		239	JE, SK		2	4				
25	"	"	JFK	PBI		240	JE, BT, EVA ANDERSSON, GM, AM, GLEN DUBIN, CELENA, JORDAN DUBIN, ROGER, MORGAN		2	5				
DEC 7	G-1159B	N909JE	MIV	JFK		1678	[MICHAEL DUBERLY]	1/1		8				
7	"	"	JFK	CMH		1679	JE, SK, NADIA [MICHAEL DUBERLY]	1/1	1	5				
7	"	"	CMH	PBI		1680	JE, SK, NADIA [MICHAEL DUBERLY]	1/1	2	3				
9	"	"	PBI	TIST		1681	JE, SK, TD [GARY ROXBURGH]	1/	2	4				
15	"	"	TIST	TEB		1682	JE, AM, TD, KIMBERLY BURNS		4	5				
19	"	"	TEB	TIST		1683	JE, GM, SK [crossed out]	1/1	3	9				
24	"	"	TIST	PBI		1684	JE, GM, BT [STEVE LISTER]	1/1	2	7				
26	"	"	PBI	TIST		1685	JE, BT, GM [GARY KENNEY]	1/	2	3				
2004 JAN 2	"	"	TIST	PBI		1686	JE, BT, GM, JEAN LUC BRUNEL, NM, MANUELLA STOCKTER LV	1/1	2	7				
3	"	"	PBI	ISM		1687	JE, CELENA DUBIN, EVA ANDERSSON, GM, JORDAN DUBIN, BRUCE, NADIA MARCINKOVA LV			7				
3	"	"	ISM	PBI		1688	JE, CD, JD, GM, EA, NM BRUCE LV			7				
5	"	"	PBI	TEB		1689	JE, BT, JLB, SK, LV	1/	2	5				
8	"	"	TEB	PBI		1690	JE, BT, JLB, SK LV		2	6				
12	B-727-31H	N908JE	PBI	JFK		241	JE, BT, NM, TEALA DAVIES, SK LV LM		2	4				
15	"	"	JFK	PBI		242	JE, SK, TD, NM LV LM		2	5				
							Page Total	10/6	45	8				
							Amount Forward	6734 6369	9285	7	3	3	125	0
							Total to Date	6744	9331	5	3	3	125	0

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000069

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter
JAN 20	B-727-31H	N908JE	PBI	JFK		243	JE, BT, NM, SK, TD	LV LM		2 6		
23	"	"	JFK	PBI		244	JE, BT, CHAUNTAE DAVIES, TD, NM, ANDREA MITROVICH	LV LM		2 6		
26	G-1159B	N909JE	PBI	TEB		1691	JE, BT, NM, TD	LV	✓	2 4		
28	"	"	TEB	TIST		1692	JE, BT, NM, SK, TD	LV		3 6		
FEB 2	"	"	TIST	TEB		1693	JE, BT, JLB, NM, TD, SK, ALINE WEBER	LV	✓	4 1		
5	"	"	TEB	BED		1694		LV		8		
5	"	"	BED	TEB		1695	ALAN DERSHOWITZ	LV		1 1		
5	"	"	TEB	PBI		1696	JE, AD, SK	LV		2 6		
9	B-727-31H	N908JE	PBI	JFK		245	JE, BT, SK,	GR LM	✓	2 5		
12	"	"	JFK	LFPB		246	JE, GM, JLB, ALINE WEBER, NINA KEITA	LV LM		7 0		
17	"	"	LFPB	BGR		247	JE, GM, JLB, NM, TD, AW	LV LM		6 9		
17	"	"	BGR	JFK		248	JE, GM, JLB, TD, NM, AW	LV LM		1 5		
19	"	"	JFK	PBI		249	JE, BT, NM, SK, TD,	LV LM		2 4		
22	"	"	PBI	JFK		250	JE, BT, NM, TD, AW	LV LM	✓	3 0		
24	"	"	JFK	MRY		251	JE, SK, TD, NM, FOREST SAWYER	LV LM		5 9		
27	"	"	MRY	VNY		252	JE, NM, SK, TD	LV LM	✓1	8		
29	"	"	VNY	ABQ		253	JE, NM, SK, TD	LV LM		1 6		
MAR 1	"	"	ABQ	JFK		254	JE, GM, NM, SK, TD	LV LM	✓	3 4		
3	"	"	JFK	PBI		255	JE, NM, TD, VALDSON COTRIN	LV LM		2 5		
							Page Total		6 / 1	57 3		
							Amount Forward		6744 / 6375	9331 5	33	125 0
							Total to Date		6750	9388 8	33	125 0

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000070

Date 19 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER
MAR 7	G-1159B	N909JE	PBI	TEB		1697	JE, NM, TD GARY BLACKWELL	\/	2	8			
8	"	"	TEB	BGD		1698	JE, TD GARY BLACKWELL	\/		8			
9	"	"	BGD	TEB		1699	JE, TD GARY BLACKWELL	\/	1	1			
11	"	"	TEB	PBI		1700	JE, TD, SK, NM VALDSVINE OTBEN GB		2	6			
13	"	"	PBI	TIST		1701	JE, TD, SK, VC, NM STEVE LESTER	\/1	2	3			
17	B-727-200	SIMULATOR	MIA	MIA			LARRY-INSTRUCTOR GARY ROXBURGH		2	0			
17	"	"	MIA	MIA			HOLDING LARRY-INSTRUCTOR GR		2	0			
17	"	"	MIA	MIA			FLECHECK-RIDE HANK COLLER GR		2	0			
18	"	"	MIA	MIA			REY BARZANA GR		3	0			
18	"	"	MIA	MIA			REY BARZANA B-727 CAPT CHECK RIDE GR		3	0			
19	G-1159B	N909JE	TIST	PBI		1702	JE, SK, TD, VC LV		2	6			
31	B-727-31H	N908JE	PBI	JFK		256	JE, NM, TD, LV LM	\/1	2	3			
APR 2	"	"	JFK	PBI		257	JE, JLB, NM, TD LV LM		2	5			
6	G-1159B	N909JE	PBI	TIST		1705	JE, BT, NM, SK, TD LV	\/1	2	3			
11	B-727-31H	N908JE	PBI	JFK		258	JE, BT, CD, EA, JD, GM, NM, TD GLEN DUBIN, EVA DUBIN, 2 INFANTS LV LM	\/1	2	4			
15	"	"	JFK	BGD		259	JE, SK, LARRY SUMMERS LV LM			9			
16	"	"	BGD	PBI		260	JE, SK LV LM	1/0	2	6			
19	"	"	PBI	JFK		261	JE, SK, JENNIFER LV LM		2	6			
22	"	"	JFK	PBI		262	JE, BT, MARK EPSTEIN, NM TD, TAMI, GM LV LM	\/	2	5			
							Page Total	9/4	42	3			
							Amount Forward	6750 6376	9358	8	3	3	125
							Total to Date	6759 6380	943	1	3	3	12[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
APR 27	B-727-31H	N908JE	PBI	JFK		263	JE, BT, NM, TD LV LM		2 2		
MAY 1	"	"	JFK	PBI		264	JE, NM, SK LV LM		2 6		
4	"	"	PBI	JFK		265	JE, NM, SK LV LM		2 4		
5	"	"	JFK	LFPB		266	JE, GM, NM, SK ARIANE PEYNOUVESEN LV LM	/1	6 9		
8	"	"	LFPB	EGGW		267	JE, GM, NM, SK LV LM		9		
10	"	"	EGGW	LKPR		268	JE, GM, NM, SK LV LM	\/1	1 8		
12	"	"	LKPR	LFPB		269	JE, GM, JLB, NM LV LM		1 4		
14	"	"	LFPB	CYQX		270	JE, NM, SK, LV LM	\/1	5 8		
14	"	"	CYQX	PBI		271	JE, NM, SK LV LM	\/1	4 2		
15	G-1159B	N909JE	PBI	PBI		1707	RON LV LM	\/1	7		
17	"	"	PBI	TEB		1708	JE, BT, NM, TD LV		3 2		
21	"	"	TEB	PBI		1709	JE, BT, NM, TD LV	\/	2 4		
24	"	"	PBI	TIST		1710	JE, NM, SK, TD LV		2 6		
31	"	"	TIST	TEB		1711	JE, NM, SK, TD, MANUELA STEFFER LV	\/1	4 2		
JUN 4	"	"	TEB	HVN		1712	BT LV		5		
4	"	"	HVN	PBI		1713	JE, BT, MS, NM, TD LV		2 7		
7	"	"	PBI	TEB		1714	JE, BT, MS, NM, TD LV	||	2 5		
9	"	"	TEB	BED		1715	JE, MS, SK LV		9		
9	"	"	BED	TEB		1716	JE, MS, SK LV		8		
							Page Total	7/7	48 7		
							Amount Forward	6759 6390	9431 1	3 3	125
							Total to Date	6766 6397	9479 8	3 3	125

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date ~~19~~ 2004	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter
JUN 11	G-1159B	N909JE	TEB	MDW		1717	JE, SK	LV	1/1	1.9		
13	"	"	MDW	PBI		1718	JE, SK	LV		2.7		
13	B-727-31H	N908JE	PBI	JFK		272	JE, SK, A.D. GESMAR,	LV LM		2.5		
15	"	"	JFK	TIST		273	JE, BT, MS, SK, TD	LV LM	1/1	3.5		
20	"	"	TIST	PBI		274	JE, BT, JENNIFER KALIN, MS, NM, NATALYA MALYSHEV	GR LM	1/1	2.5		
21	G-1159B	N909JE	PBI	TEB		1719	JE, BT, MS, NM	LV		2.6		
23	"	"	TEB	SAF		1720	JE, NM, SK	LV	1/1	4.4		
JUL 2	"	"	SAF	LAS		1721	JE, MS, NM, SK, SGMOINE,	GR	1/1	1.6		
2	"	"	LAS	SAF		1722	JE, MS, NM, SK, SGMOINE,	GR		1.3		
4	"	"	SAF	ASE		1723	JE, MS, NM, SK, SGMOINE	GR	1/1	.9		
4	"	"	ASE	PBI		1724	JE, MS, NM, SK, SGMOINE	GR	1/D	3.8		
11	"	"	PBI	TEB		1725	JE, ANDREA MITROVICH, BT, NM, SK	LV		2.7		
15	"	"	TEB	PBI		1726	JE, BT, JLB, NM, SK, JK, 2 SUITS, CLE FRIEDL	LV	1/	2.6		
19	B-727-31H	N908JE	PBI	TIST		275	JE, BT, SK, NM, JK, STEFANIE	LV LM		2.6		
22	"	"	TIST	PBI		276	JE, BT, NM, SK, JK STEVE MALLER	LM		2.6		
25	"	"	PBI	JFK		277	JK, NM, BT	SM LM	1/1	2.4		
29	"	"	JFK	LFPB		278	JE, MS, NM, SK	LV LM		6.6		
AUG 3	"	"	LFPB	LEPA		279	JE, MS, NM, SK, TD	LV LM	1/1	1.7		
3	"	"	LEPA	LPAZ		280	JE, MS, NM, SK, TD	LV LM	1/1	3.6		
							Page Total		11/9	52.5		
							Amount Forward		6166 6387	9479.8	3.3	12.5
							Total to Date		6177 6396	9532.3	3.3	12.5

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter
AUG 3	B-727-31H	N908JE	LPAZ	TIST		281	JE, MS, NM, SK, TD, LV LM	1/	5 6		
6	"	"	TIST	PBI		282	JE, SK, TD, JENNIFER KALIS, NATALYA MALYSHOV LV LM		2 4		
10	"	"	PBI	JFK		283	JE, JOJO, LYN FONTANELLA, SK, NATALYA MALYSHOV, DAVID LV LM		2 4		
13	"	"	JFK	ABQ		284	JE, MS, N MARCENKOVA, FLORA, DAVID, JK LV LM	1/1	4 7		
18	"	"	ABQ	VNY		285	JE, MS, NM, JK LV LM		1 7		
19	"	"	VNY	PBI		286	JE, MS, NM, JK FRANK GAMBLE LM		4 7		
24	"	"	PBI	SEGU		287	JE, GM, NM, SK, TD LV LM		4 1		
25	"	"	SEGU	PBI		288	JE, GM, NM, SK, TD LV LM	1/1	4 3		
SEP 1	"	"	PBI	TIST		289	JE, NM, SK, TD LV LM		3 2		
2	G-1159B	N909JE	PBI	TEB		1727	KRISTY RODGERS, PATSY RODGERS LV		2 5		
5	B-727-31H	N908JE	TIST	JFK		290	JE, NM, TD, JK, NATALYA MALYSHOV RALPH PASCALE LV	1/	3 8		
16	"	"	JFK	PBI		291	JE, NM, SK, JK, DAVID MULLEN LV LM		2 7		
20	BHT-407	N407BP 53355	BELLSCHOOL	HURST, TX			HOVER, HOVER AUTOS, OBSTACLE TAKE-OFF STRAIGHT-IN AUTOS, 180° AUTO		~~1 2~~		1
21	BHT-407	N407BP 53355	BELLSCHOOL	HURST, TX			[illegible] 1733849 CFI EXP 10/06		~~1 0~~		1
27 5	B-727-31H	N908JE	PBI	JFK		296	JE, NM, SK, LV LM	1/1	2 4		
8	"	"	JFK	PBI		297	JE, EVA ANDERSSON, NM, 2 NANNIES, CELINA + MYA DUBIN, JORDAN, SK LV LM		2 3		
10	"	"	PBI	JFK		298	JE, EVA ANDERSSON, 2 NANNIES, SK, GM, CELINA + JORDAN + MYA DUBIN LV LM	1/	2 5		
12	"	"	JFK	TIST		299	JE, JK, NM, SK LV LM		3 3		
13	G-1159B	N909JE	TEB	PBI		1728	GM LV LM		2 5		
							Page Total	6/3	55 1		2
							Amount Forward	6377 6396	9532 3	3 3	125
							Total to Date	6383 6399	9587 4	3 3	127

I certify that the statements made by me on this form are true.

CONFIDENTIAL DR_000074

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane	Glider	Heli
OCT 16	B-727-31H	N908JE	TIST	PBI		300	JE, JK, NM, SK, LAURA & NOREW, LESA ANDREW	LV LM	1	2.4		
17	"	"	PBI	JFK		301	JE, GM, JK, NM, LAURA & LESA ANDREW	LV LM		2.5		
20	"	"	JFK	LFPB		302	JE, JK, NM, SK, DAVID MULLIN	LV LM	1	6.8		
25	"	"	LFPB	JFK		303	JE, NM, JK, SK, DM	LV LM		7.6		
25	"	"	JFK	JAX		304		LV LM		2.1		
29	G-1159B	N909JE	PBI	TEB		1729		LV		2.6		
29	"	"	TEB	PBI		1730	JE, JK, NM, NATALIE	LV		2.3		
NOV 1	"	"	PBI	TIST		1731	JE, NM	LV	1 1	2.6		
1	BHT-407	N491GM	TIST	LSJ				LV				
1	"	"	LSJ	TIST				LV				
2	G-1159B	N909JE	TIST	TEB		1732	JE, NM	LV		4.0		
7	G-1159B	SIMULATOR	DFW	DFW			STEEP TURNS, STALLS, JET UPSET, ICING, SE. ILS, ABORT, ENGINE FIRE			4.6		
8	"	"	"	"			HOLDING, HIGH ALTITUDE AIRPORTS, EMERGENCY DESCENT, 1EO NORMAN RUNDLE			4.0		
9	"	N909JE	PBI	TEB		1734	JE, SK	PIA TRUSELL	1	2.7		
10	"	"	TEB	PBI		1735	JE, SK	PIA TRUSELL		2.4		
14	"	"	PBI	ABY		1736	JE, NM, SK, TD, VC	LV		1.3		
14	"	"	ABY	TEB		1737	JE, NM, SK, TD, VC	LV		2.1		
16	"	"	TEB	BED		1738	JE, ANDREA	LV	1 1	.8		
16	"	"	BED	TEB		1739	JE, ANDREA	LV		.8		
							Page Total		4/3	51.0		
							Amount Forward		6783 8399	9587.4	33	127
							Total to Date		6787 6402	9638.4	33	128

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000075

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
NOV 18	G-1159B	N909JE	TEB	PBI		1740	JE, JK, NM, SK, DM, [illegible] LV		2 3		
20	B-727-31H	N908JE	JAX (NC MTNS)	JAX		315	LV EM	✓	2 6		
20	"	"	JAX	PBI		316	LV EM	✓	1 0		
23	"	"	PBI	TIST		307	JE, NM, SK, DM, SUSAN HAMBLEN LV EM		2 3		
26	G-1159B	N909JE	PBI	TIST		1741	GM, JK LV	✓	2 4		
28	B-727-31H	N908JE	TIST	JFK		308	JE, GM, JK, NM, SK, DM, SH LV EM	✓	4 0		
DEC 3	"	"	JFK	PBI		309	JE, NM, SK, SH, ADRIANNA LV EM		2 8		
14	B-727-200	SIMULATOR	MID	MID			HANK COLLER - INSTRUCTOR		1 0		
15	"	"	"	"			HANK COLLER - INSTRUCTOR WILLIAM JOSU		1 7		
15	"	"	"	"			HANK COLLOR REY BAZAN - INSTRUCTOR WILLIAM		1 7		
21	G-1159B	N909JE	PBI	TIST		1745	JE, SK, NM, GM STEVE LESTOR	✓	2 3		
29	"	"	TIST	TNCM		1746	JE, NM, SK LV		7		
29	"	"	TNCM	TIST		1747	JE, NM, SK LV		7		
30	BHT-407	N491GM	TIST-LSJ	TISX			LV				
30	"	"	LSJ	TIST			LV				
JAN 1	G-1159B	N909JE	TIST	TQPF		1748	JE, JLB, SK, DM, NM, ~~NADER BTORLEN~~, ZINTA BROWN LV	✓	6		
1	"	"	TQPF	PBI		1749	JE, DM, JLB, NM, SK, ZB LV	✓	3 2		
3	"	"	PBI	TEB		1750	JE, DM, GM, NM, SK LV		2 7		
6	"	"	TEB	PBI		1751	JE, DANA LV		2 7		
							Page Total	7/5	35 5		1
							Amount Forward	6787 / [illegible]	9639 4		33 12.[illegible]
							Total to Date	6794 / [illegible]	9613 9		33 12.[illegible]

I certify that the statements made by me on this form are true.

[signature] David Rodgers

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane		Glider
JAN	G-1159B	N909JE	PBI	RSW		1752		LV			6	
8	"	"	RSW	PBI		1753		LV	1/1		6	
11	B-727-31H	N908JE	PBI	TIST		310	JE, NM, SK	LV LM		2	5	
14	"	"	TIST	PBI		311	JG, NM, SK	LV LM		2	8	
27	"	"	PBI	TIST		315	JE, NM, ANDREA	LV LM		2	3	
31	"	"	TIST	JFK		316	JE, NM, SK, DB ANDREA MUNCZENSKI	LV LM		3	0	
FEB 3	"	"	JFK	CMH		317	JE, DM, JLB, NM, SK, DANA BURNS	LV LM	1/1	1	4	
3	"	"	CMH	PBI		318	JG, DM, JLB, NM, SK	LV LM		2	2	
7	"	"	PBI	JFK		319	JG, DM, NM, SK	LV LM		2	5	
10	G-1159B	N909JE	PBI	PBI		1754	NEEL, BIGGEN PETE RATHGEB		1/1	1	1	
19	"	"	PBI	TIST		1755	COLLEEN	GR	1/1	2	4	
19	"	"	TIST	PBI		1756	GM, EVA ANDERSSON, CECENA + M??? DUBEN, CRESCENCIO VALDEZ	GR	1/	2	7	
24	B-727-31H	N908JE	PBI	PBI		324	BILL HAMMOND	LV LM			5	
MAR 1	"	"	PBI	JFK		325	JE, NM, DB, DM, ADRIANA MUCINSKA	LV LM	1/1	2	4	
6	B-727-200	SIMULATOR	MIA	MIA			HOLDING, STEEP TURNS, STALLS, RTO, V1 CUT, 2EO, 1EO, RICK MONTANO - E...			2	0	
7	"	"	MIA	MIA			RTO, STEEP TURNS, STALLS, 1EO, 2EO, ... CIRCLING APPROACH, EVALUATION VR... BILL MURPHY			2	5	
8	G-1159B	N909JE	PBI	SAN		1759	GM		1/	5	6	
13	"	"	SAN	MDW		1760	GM	BM	1/	3	5	
14	"	"	MDW	TEB		1761	GM	BM	1/1	1	7	
							Page Total		9/6	43	1	
							Amount Forward		6794 6407	9673	9	33...
							Total to Date		6803 6413	9717	0	33...

I certify that the statements made by me on this form are true.

David Rodgers

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category...		
										AIRPLANE	G-1159	HELI
MAR 24	B-727-31H	N908JE	JFK	TEST		333	JE, NM, SK, DB, DM	LV BH		3 6		
29	"	"	TEST	JFK		334	JE, NM, SK, DM, DB	BH LM	1/1	3 1		
31	"	"	JFK	PBI		335	JE, GM, DB	LV LM		2 8		
APR 1	G-1159B	N909JE	SAV	PBI		1766		LV LM		1 2		
5	"	"	PBI	PDK		1767	GM	LV	1/1	1 6		
5	"	"	PDK	TEB		1768	GM	LV	1/	1 8		
6	B-727-31H	N908JE	PBI	JFK		336	JE, DB, DM, SK, ADRIANA MUCINSKA	LV LM	1/1	2 5		
29	G-1159B	N909JE	PBI	TEST		1773	JE, MS, VC, TATIANNA, ADRIANA MUCINSKA	LV		2 3		
MAY 4	"	"	TEST	TEB		1774	JE, AM, NM, VC	BH	1/1	4 1		
6	"	"	TEB	PBI		1775	JE, AM, DM, NM, SK	LM LV		2 5		
10	"	"	PBI	TEB		1776	JE, DB, DM, SK	LV	1/1	2 6		
12	B-727-31H	N908JE	JFK	TEST		339	JE, AM, DM, NM, DB	BH LM	1/	3 1		
16	"	"	TEST	JFK		340	JE, NM, DB, DM, AM	BH LV		3 3		
19	G-1159B	N909JE	TEB	PBI		1777	JE, AM, SK	BH	1/	2 5		
24	"	"	PBI	TEB		1778	JE, AM, SK	LV		2 6		
JUN 1	"	"	PBI	TEB		1781	JE, AM, NM	LV	1/1	2 5		
15	B-727-200	SIMULATOR	MIA	MIA			RICK MONNER - INSTRUCTOR			2 0		
15	"	"	"	"			REY BARZANA - V RIDE			2 0		
JUN 21	G-1159B	N909JE	TEB	PBI		1786	JE, DB, SK	LV	1/	4 4		
							Page Total		10/6	50 4		
							Amount Forward		6903 6413	9717 0	3 3	1241 1
							Total to Date		6913	9767 4	3 3	1241 1

I certify that the statements made by me on this form are true.

David Rodgers

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Heli...
JUL 5	G-1159B	N909JE	PBI	TEB		1787	JE, AM, SK LV		2 5		
10	"	"	TIST	TEB		1791	JE, AM, DB, NM BH	1/1	4 0		
18	"	"	PBI	TEB		1792	JE, DB, SK LV	1/1	2 6		
20	"	"	TEB	BKL		1793	GM, IAN JIM DOWD	1/1	1 2		
20	"	"	BKL	TEB		1794	GM, IAN JIM DOWD	1/1	1 2		
22	"	"	TEB	PBI		1795	JE, SK, DB, TATIANNA BH		2 5		
25	"	"	PBI	TEB		1796	JE, SK, DB, TATIANNA BH	1/1	2 6		
29	"	"	TEB	TIST		1797	JE, NM, JK BH	1/	3 9		
AUG 1	"	"	TIST	TEB		1798	JE, JK, NM BH	1/1	3 8		
2	"	"	TEB	SAF		1799	JE, SK, DB, AM, ALEX, NATALGE SEMOVA, TATIANA BH	1/1	3 6		
18	"	"	TEB	PBI		1804	JE, AM, MR & MRS MUCINSKA, NM, MS MUCINSKA LV	1/1	2 3		
22	"	"	PBI	TEB		1806	JE, NM LV		2 5		
24	"	"	TEB	FDK		1807	JE, DB LV	1/1	8		
24	"	"	FDK	TEB		1808	JE, DB LV	1/1	8		
26	"	"	TEB	MVY		1809	JE, DB, SK, DM LV		8		
26	"	"	MVY	TIST		1810	JE, DB, DM, SK LV		3 3		
27	"	"	TIST	PBI		1811	LV	1/1	2 6		
SEP 5	"	"	PBI	TEB		1814	JE, DB, GM, AM BH		2 4		
8	B-727-200 SIMULATOR		MIA	MIA			HAL LEXO - INSTRUCTOR LM		2 0		
							Page Total	12/11	45 4		
							Amount Forward	6813 6419	9767 4	3 3	12
							Total to Date	6825	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Heli...
SEP 9	B-727-200	SIMULATOR	MIA	MIA			LM V REC REC BARZANNA V RIDE LEND EXAMINER		1 0		
11	G-1159B	N909JE	PBI	TIST		1816	JE, AM, NM LV		2 6		
13	"	"	TIST	TEB		1817	JE, AM, NM BH	V1	3 8		
14	"	"	TEB	BED		1818	JE, AM, SK BH		8		
14	"	"	BED	HPN		1819	JE, AM, SK, LARRY SUMMERS BH		8		
20	"	"	PBI	TIST		1821	JE, DB, SK, JIM LV	V	2 5		
24	"	"	TIST	TEB		1822	JE, ALEX RESNIK, SANDY BERGER, DB, SK, TATIANA SEMANOVA LV		3 7		
25	"	"	TEB	CMH		1823	JE, NM, SK, PAUL HALODB LV	V1	1 4		
25	"	"	CMH	TEB		1824	JE, NM, SK LV	1/1	1 4		
27	"	"	TEB	BED		1825	JE, AM, NM LV		8		
27	"	"	BED	TEB		1826	JE, AM, NM LV		1 0		
OCT 8	B-727-31H	N908JE	LCQ	LCQ		343	~~JE, AM, NM~~ GEORGE GEYER LM	V/	1 7		
22	"	"	TIST	JFK		348	JE, AM, NM BH LM	0/0	3 7		
NOV 2	G-1159B	N909JE	TEB	BED		1834	JE, GM, SK, TATIANNA, DB LV		8		
2	"	"	BED	OQU		1835	GM LV		5		
2	"	"	OQU	BED		1836	GM LV		5		
2	"	"	BED	TEB		1837	JE, DB, GM, SK, TATIANNA LV		9		
3	B-727-31H	N908JE	JFK	TIST		351	JE, NM, SK LV LM		4 4		
8	"	"	TIST	JFK		352	JE, ANDREA MITROVICH, NM, SK, CRISTALLE WASCHE, [illegible] ZIMOVSKY, CHAPMAN, PETE BH LM		3 9		
							Page Total	5/4	37 2		
							Amount Forward	6815 / 6430	9812 8	3 3	1 2 1 4
							Total to Date	6830 / 6434	9850 0	3 3	1 1 4 4

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter
NOV 12	G-1159B	N909JE	TEB	TIST		183[illegible]	JE, ADRIAN MUCINSKA, [illegible], NM, VE, MARK TAGOYA BH		3.4		
16	"	"	TIST	TEB		1839	JE, AM [illegible], NM LV		3.8		
17	"	"	TEB	BED		1840	JE, ~~AM~~ AM LV	1/1	.8		
17	"	"	BED	CYUL		1841	ALAN DERSHOWITZ LV	1/1	.9		
17	"	"	CYUL	BED		1842	ALAN DERSHOWITZ LV		.8		
17	"	"	BED	TEB		1843	JE, AM, AD, TATIANNA LV		.9		
19	B-727-31H	N908JE	JFK	TIST		353	JE, NM, SK LV LM		3.5		
20	"	"	TIST	TNPA		354	JE, NM, SK, TATIANA KOVYLINA LV LM	1/1	.9		
20	"	"	TNPA	TIST		355	JE, ~~[illegible]~~, NM, SK, TATIANA KOVYLINA LV LM	1/1	.8		
28	"	"	TIST	JFK		356	JE, AM, EZ, MARK TAGOYA, TATIANA SEMANAVA, JUAN MOLYNEUX BH LM		3.9		
30	G-1159B	N909JE	TEB	BED		1844	JE, AM, NM BH		.8		
30	"	"	BED	TEB		1845	JE, AM, NM BH		.9		
DEC 10	"	SIMULATOR	DFW	DFW			HOLDING, STEEP TURNS, STALLS, [illegible], NO FLAP LANDING, NUTCRACKER FAILURE		2.5		
"	"	"	"	"			RTO, EMERGENCY DESCENT, V1 CUT, WIND SHEAR, NO FLAP LANDING	2/2	2.0		
21	"	N909JE	TEB	BED		1852	GM LV		.9		
21	"	"	BED	TIST		1853	GM, LARRY + LISA SUMMERS LV		3.8		
2006 JAN 15	"	"	TIST	BED		1854	JE, NM LV	1/	3.8		
16	"	"	BED	TEB		1855	JE, NM LV		1.6		
19	"	"	TEB	SAF		1856	JE, GM, EZ, NM, SK LV		4.5		
							Page Total	7/6	39.8		
							Amount Forward	6830 / 6834	9850.0	33	129.4
							Total to Date	6837	[illegible]	33	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Instructions

Master/Sub-file

Form

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
JAN 23	G-1159B	N909JE	SAF	TEB		1857	JE, IGOR ZINOVIEW, SARAH KELLEN, NADIA MARCINKOVA, JOANNA	0/0	3 3				3
26	"	"	TEB	TIST		1858	JE, IZ, NM, JOANNA		3 4				3
31	"	"	TIST	BGD		1859	JE, ADRIANA/MUCINSKA, NM		3 8				3
31	"	"	BGD	TEB		1860	JE, AM, NM		1 0				1
FEB 15	"	"	TIST	BOS		1863	GARY FENNELL	1/1	4 0				4
15	"	"	BOS	PBI		1864	ALAN DERSHOWITZ, GARY FENNELL, MITCH	1/1	3 0				3
16	"	"	PBI	TEB		1865	ALAN DERSHOWITZ GARY FENNELL MITCH BH	1/1	2 4				2
21	"	"	TIST	TEB		1867	JE, IZ, NM BH		4 1				4
22	"	"	TEB	BGD		1868	JE, NM BH		9				
22	"	"	BGD	TEB		1869	JE, NM	1	9				
24	"	"	TEB	TIST		1870	JE, IZ, NM, SK, LANCE CALLOWAY BH		3 [illegible]				[illegible]
26	"	"	TIST	TEB		1871	JE, IZ, NM, SK, LC		4 1				[illegible]
MAR 12	"	"	TIST	TEB		1873	JE, IZ, SK, LC, TATYANA SIMANOVA BH, STEFANIE TEDWELL, NINA MCGLASHENKO	1/	4 2				[illegible]
13	"	"	TEB	BGD		1874	JE, NM, ST BH		8				
14	"	"	BGD	TEB		1875	JG, NM, ST		1 0				1
16	"	"	TEB	TIST		1876	JE, IZ, SK, LC, DANA BURNS BH	1/1	3 4				[illegible]
23	B-727-200	SIMULATOR	MIA	MIA			HAL LEXO - SIM INSTRUCTOR, HOLDEN WILLIAM LEONARDO - GROUND INSTRUCTOR		2 0				[illegible]
23	"	"	"	"			B-727 CHECK RIDE RAY BARZANA		2 5				[illegible]
24	"	"	"	"			FLIGHT ENGINEER - PC RAY BARZANA, WILLIAM, HAL		2 0				[illegible]
							Page Total	5/5	50 2				
							Amount Forward	6837 6440	9889 8	3 3	129 4	2176 8	77[illegible]
							Total to Date	6842 6445	9940 0	3 3	129 4	2176 8	7[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Instructions

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL	HELO LAND
MAR 28	G-1159B	N909JE	TIST	TEB		381	JE, DB, LC, TS,	LV	1/1	4 0				4 0	
APR 3	"	"	TEB	TIST			JE, I2, LC, NM, SK	LV		3 6				3 6	
17	B-727-31H	N908JE	TIST	JFK		366	JE, DB, GM, I2, LC, SK	LV LM		3 9				3 9	
25	"	"	JFK	BED		367	JE, I2, LC, NM, SK	BH LM	1/1	9				9	
25	"	"	BED	TIST		368	JE, I2, LC, NM, SK	BH LM	1/	3 4				3 4	
MAY 1	BHT-407	N407BP	AFW	ASW			MR/MS. HOLDER OF PILOT CERTIFICATE #					1 4			
2	"	"	AGW	ASW			HAS SATISFACTORILY COMPLETED THE FLIGHT REVIEW REQUIRED BY FAR 61.56 ON 5/2/06 BY [signature]					1 4			
2	"	FTD	AFW	AFW			CERTIFICATE NO. 3077866 CFI EXPIRES 12/31/07 MIKE TERRY - INSTRUCTOR					5			
20	B-727-31H	N908JE	JFK	LFPB		372	JE, DB, GM, NM, SK	LV LM	0/1	6 9				6 9	
26	"	"	LFPB	BGR		373	JE, DB, SK	LV LM		7 4				7 4	
26	"	"	BGR	JFK		374	JE, DB, SK	LV LM		1 3				1 3	
29	"	"	JFK	TIST		375	JE, DB, I2, LC	BH LM	1/1	3 5				3 5	
JUN 3	"	"	TIST	JFK		376	JE, I2, LC, SK, JUAN MOLYNEUX, KATHERINE DARBY, STEFANIE TOWELL	BH LM		3 8				3 8	
7	"	"	JFK	TIST		377	JE, I2, LC, SK, STEFANIE TOWELL, RUSLANA KORSHONOVA	LV LM	1/	3 7				3 7	
24	"	"	ABQ	JFK		380	JE, I2, LC, SK, ST	LV LM		3 9				3 9	
JUL 4	"	"	TIST	JFK		382	JE, LC, NM, I2	LV LM		3 8				3 8	
8	"	"	JFK	TIST		383	JE, NM, SK, ST	LV BH		3 7				3 7	
12	"	"	TIST	JFK		384	JE, NM, SK, ST	BH LM		3 7				3 7	
14	"	"	JFK	EGGW		385	JE, GM, DB, SK	BH LM	1/1	6 5				6 5	
							Page Total		6/5	64 0		3 3		64 0	
							Amount Forward		6842 / 6445	9940 0	33	129 4	2176 8	7763 2	4
							Total to Date		6848 / 6450	10,040 0	33	132 7	2176 8	7827 2	4

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Instructions

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL	HEL
JUL 18	B-727-31H	N908JE	EGGW	LFPB		386	JE, GM, SK BH LM		1 0				1 0	
20	"	"	LFPB	JFK		387	JE, SK BH LM	1/1	7 7				7 7	
22	"	"	JFK	PBI		388	JE, SK, JK, JOULIA STARODOUMOVA BH LM		3 0				3 0	
23	G-1159B	N909JE	PBI	TIST		1890	JE, SK, JK, JOULIA STARODOUMOVA LV		2 6				2 6	
23	"	"	TIST	EWR		1891	JE, SK, JK, JOULIA STARODOUMOVA LV	0/	3 6				3 6	
AUG 16	"	"	TEB	EGGW		1896	JIM WORDEN	1/1	6 5				6 5	
17	"	"	EGGW	LEIB		1897	GM JW	1/1	2 5				2 5	
19	"	"	LEIB	EGGW		1898	GM JW		2 3				2 3	
25	"	"	EGGW	LFTH		1899	GM JW	1/1	1 7				1 7	
28	"	"	LFTH	LFBE		1900	GM, KEVIN MAXWELL, LADY ROBIN INNES KER JW	1/1	1 2				1 2	
28	"	"	LFBE	EGGW		1901	GM, KEVIN MAXWELL, LADY ROBIN INNES KER JW	1/1	1 5				1 5	
SEP 1	"	"	EGGW	EGPH		1902	GM, PRINCE ANDREW - DUKE OF YORK, KATIE BRAEING, GRASNAPSKY JW	1/1	1 0				1 0	
2	"	"	EGPH	CYQX		1903	GM JW	1/1	4 5				4 5	
2	"	"	CYQX	TEB		1904	GM JW	1/1	2 8				2 8	
22	B-727-31H	N908JE	EWR	MIA		398	JE, DANA BURNS, IGOR ZINOVIEV, TATYANA SIMANAVA BH LM	1/1	2 5				2 5	
22	"	"	MIA	TIST		399	JE, DANA BURNS, IGOR ZINOVIEV, TATYANA SIMANAVA BH LM	1/	2 5				2 5	
23	"	"	TIST	VQQ		400	[redacted] BH LM		2 9				2 9	
24	G-1159B	N909JE	TEB	TIST		1905	GM, JENNIFER KALIN, LANCE CALLOWAY, NADIA MARCINKOVA LV		3 6				3 6	
OCT 2	"	"	TIST	BED		1906	JE, NADIA MARCINKOVA, SARAH KELLEN LV	1/1	3 9				3 9	
							Page Total	12/11	57 3				57 3	
							Amount Forward	6848 6450	10,004 0	3 3	132 7	2176 8	7827 2	4
							Total to Date	6860 6461	10,061 3	3 3	132 7	2176 8	7884 5	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
OCT 2	G-1159B	N909JE	BED	TEB		1907	JE, NADIA MARCINKOVA, SARAH KELLEN, DANA BURNS, ANDREA WILLIS LV		.9				
6	"	"	TEB	TIST		1908	JE, LANCE CALLOWAY, NADIA MARCINKOVA, NATALYA MALYSHEV, VENESSA LV		4.4				4
26	"	"	TIST	TEB		1913	JE, BARBARA MOSKOVA, LANCE CALLOWAY, NADIA MARCINKOVA, SARAH KELLEN BH	1/1	4.2				4
27	"	"	TEB	TIST		1914	JE, NADIA MARCINKOVA BH		3.4				3
NOV 8	"	SIMULATOR	DFW	DFW			JOHN CASEY-INSTRUCTOR, FRANK MCAFEE-CREW / STEEP TURNS, STALLS, CIRCLING APR, HOLDING, RTO, SE ILS		4.0				4
9	"	"	DFW	DFW			NORM THOMPSON-INSTRUCTOR, FRANK MCAFEE-CREW / NO FLAP LANDING, EM. DESCENT, WIND SHEAR, 2 EO		4.0				4
13	B-727-31H	N908JE	ABQ	TIST		405	JE, JENNIFER KALEN, NADIA MARCINKOVA LV LM	1/1	4.9				4
20	"	"	TIST	EWR		406	JE, JENNIFER KALEN, IGOR ZINOVIEV, LANCE CALLOWAY, VANESSA BREUER, NM LV LM		3.7				3
21	"	"	EWR	ABQ		467	JE, IK, NM, SK, KATHRYN KUCKA, VANESSA BREUER, IZ LV LM		4.3				4
25	"	"	ABQ	TIST		468	JE, IZ, NM, SK LV LM		5.1				5
27	BHT-407	N491GM	PBI	FXE			TO CAV AIR FOR MAINT				5		
27	"	"	FXE	PBI			FROM CAV AIR FOR MAINT				5		
DEC 1	B-727-200	SIMULATOR	MIA	MIA			WILLIAM LEONARDO-INSTRUCTOR, RICARDO ADAMS-CREW / LOSS OF ALL GENERATORS, ELEC ASSYMETRY, 2 ENGINES DROP		2.0				2
1	"	"	MIA	MIA			REY BARZANA-INSTRUCTOR, WALDRON LEONARDO-CREW, ZACK ADAMS-CREW		2.0				2
10	G-1159B	N909JE	EWR	TIST		1919	JE, JENNIFER KALEN, SARAH RANSOM, NATALYA MALYSHEV LV	1/	3.4				2
14	"	"	TIST	EWR		1920	JE, NADIA MARCINKOVA, SARAH RANSOM LV		3.9				3
21	"	"	EWR	PBI		1921	GERALD LEFCOURT JIM WARREN	1/1	2.5				2
21	"	"	PBI	ISP		1922	GERALD LEFCOURT JIM WARREN	1/	2.5				2
2007 JAN 7	B-727-31H	N908JE	TIST	EWR		416	JE, GM, IZ, NM, NATALYA MALYSHEV, VALDSON COTRIN, JOHN A MERLINO, PRALAYA CUOMO BH EM	1/1	3.9				3
							Page Total	5/4	59.1		1.0		5
							Amount Forward	6860 / 6461	10,061.3	33	132.7	2176.8	788
							Total to Date	6865 / 6465	10,120.4	33	133.7	2176.8	794

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	AIRPLANE	GLIDER	HELICOPTER	SEL	MEL
JAN 12	B-727-31H	N908JE	EWR	TIST		417	JE, IZ, WALTER CRONKITE, NM, SK, LC, JOHN AMERLING	BH LM		3 3				3
16	"	"	TIST	BED		418	JE, IZ, LC, NM, SK, MARISA NOWAK, PRALHAD CUOMO	LV LM		3 7				3
16	"	"	BED	EWR		419	JE, NM, SK	LV LM		1 2				1
20	"	"	EWR	LFPB		420	JE, GM, LC, NM, SK, RICK SEMANSKI	LV LM	1/1	6 7				6
21	"	"	LFPB	EDDM		421	JE, SK, NM	RS LV LM		1 4				1
22	"	"	EDDM	LFPB		422	JE, SK, NM	RS LV LM		1 6				1
27	"	"	LFPB	EWR		423	JE, SK, NM, LC, JLB	RS LV LM		7 6				7
31	"	"	EWR	TIST		424	JE, ANDREW FARGUS, IZ, JK, NM	BH GEORGE GEYER		3 3				3
FEB 11	BHT-407	N491GM	TIST	LSJ				LV BH				1		
11	"	"	LSJ	TIST				LV BH				1		
12	B-727-31H	N908JE	TIST	BED		425	JE, CATHERINE DERBY, JK, NM	LV BH		3 9				3
12	"	"	BED	EWR		426	JE, CATHERINE DERBY, JK, NM	LV BH		1 0				1
20	"	"	TIST	EWR		428		LV BH		4 0				4
20	G-1159B	N909JE	ISP	EWR		1923	LARRY VISOSKI	BH		9				
22	"	"	EWR	TIST		1924		LV		3 5				3
27	"	"	TIST	EWR		1925		BH	1/1	4 1				4
27	"	"	EWR	ISP		1926		BH		6				
MAR 1	B-727-200	SIMULATOR	MIA	MIA			RICK MONNAR - INSTRUCTOR, WILLIAM LEONARDO - CREW, FERNANDO - CREW	STALLS MCA, RTO, V1 CUT		2 0				2
2	"	"	MIA	MIA			REY BARZANA - INSTRUCTOR, WILLIAM LEONARDO - CREW, CARLOS - CREW	LEO GABRENO, LEO LANDAZABAL		1 5				1
								Page Total	1/2	50 3		2		5
								Amount Forward	6865 6465	10,120 4	3 3	133 7	2176 8	794
								Total to Date	6866 6467	10,170 7	3 3	133 9	2176 8	799

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

From ____ Matter/Sub-file ____ Instructions ____

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter Landings	Conc...
MAR 16	B-727-31H	N908JE	EWR	TIST		433	CLINT WUNDERLY LV	1/1	3.5				3.5		2
20	"	"	TIST	PHL		434	LV CW		3.6				3.6		2
20	"	"	PHL	EWR		435	LV CW		.8				.8		
23	G-1159B	N909JE	ISP	TIST		1927	LV	1/	3.5				3.5		2
APR 12	B-727-31H	N908JE	EWR	TIST		436	LV CW	1/	3.8				3.8		2
18	"	"	TIST	EWR		437	LV CW		4.1				4.1		L
MAY 1	G-1159B	N909JE	TIST	EWR		1932	BH	1/1	4.0				4.0		L
15	"	"	EWR	CYXU		1933	TO PAINT SHOP (CUSTOMS) LV	1/1	1.5				1.5		
15	"	"	CYXU	CYCE		1934	TO PAINT SHOP LV	1/1	.3				.3		
17	B-727-31H	N908JE	EWR	BED		443	LV CW		.9				.9		
18	"	"	BED	TIST		444	LV CW	1/	3.9				3.9		
31	S-76C+	SIMULATOR	PBI	PBI			USE OF CHECKLIST, IIDS				1.5				
JUN 1	"	"	PBI	PBI			ENGINE HOT STARTS, POWER ASSURANCE CHECK				1.5			2	
2	"	"	PBI	PBI			ENGINE FAILURES AUTO ROTATION, PITCHING, PEDAL TURNS				1.5			8	
3	"	"	PBI	PBI			ENGINE FAILURE, 30 SECOND POWER, 2 MINUTE POWER, FMS, HSI, AUTO PILOT 3 AXIS				1.5			5	
5	"	"	PBI	PBI			STEEP TURNS, AUTO PILOT, FORCE TRIM STICK TRIM, FLIGHT DIRECTOR				4.0			3	
6	"	"	PBI	PBI			ENGINE FIRE, ENGINE SHUTDOWN, CONFINED AREAS, SINGLE ENGINE LANDINGS, RTO, MIXED MODE				4.0			7	
7	"	"	PBI	PBI			FMS OPERATIONS, HOLDING, UNUSUAL ATTITUDES, SINGLE ENGINE ILS APPROACH				4.0			1	
8	"	"	PBI	PBI			BLOW LANDING GEAR DOWN, SINGLE SERVO FAILURE, DUAL SERVO FAILURE, DECU MAJOR, MGB HOT OIL				3.7			9	
							Page Total	7/4	29.9		21.7		29.9	35	
							Amount Forward	6866/6467	19170.7	3.3	133.9	2176.8	7993.9	457	85
							Total to Date	6873/6471	19200.6	3.3	155.6	2176.8	8023.8	492	86

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date 19— 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
5-6-03	BHT-407GTD	FTD	BELL, TX	BELL, TX			FADEC TRAINING				1 0		
5-7-03	"	"	BELL, TX	BELL, TX			FADEC TRAINING				1 0		
2007 JUN 9	SK-76C+	SIMULATOR	PBI	PBI			STUCK PEDALS, FIXED PITCH, CABLE FAILURE, DITCHING, AUTO ROTATIONS, CONFINED LANDING AREA				4 0		
10	"	"	PBI	PBI			SETTLING WITH POWER, DUAL SCAS FAILURE, FIXED PITCH, BRAKE FAILURE, NO TAIL ROTOR AUTOROTATIONS				4 0		
19	B-727-31H	N908JE	EWR	TIST		450	LV CW		3 7				
22	"	"	TIST	CMH		451	LV CW	1/	4 0				
23	"	"	CMH	EWR		452	LV CW		1 4				
25	"	"	EWR	MIA		453	LV CW	1/1	2 6				
JUL 9	"	"	TIST	EWR		457	LV CW	1/1	3 8				
19	G-1159B	N909JE	CYCE	CYXU		1935	EMERGENCY - BLOW NOSE GEAR DOWN LV		1 4				
20	"	"	CYXU	PTK		1936	LV	1/1	1 0				
21	B-727-31H	N908JE	EWR	EWR		460	LV CW	1/1	1 0				
22	"	"	EWR	TIST		461	LV CW		3 8				
22	"	"	TIST	MIA		462	LV CW		2 7				
23	B-727-200	SIMULATOR	MIA	MIA			HAL LEYO, JOE GLEASON FE RECURRENT		2 0				
24	"	"	MIA	MIA			RICK BARZANA - PC FE, HAL LEYO JOE GLEASON		1 0				
30	G-1159B	N909JE	TIST	TEB		1940	BH	1/1	3 8				
31	"	"	TEB	MIA		1941	BH		2 7				
31	B-727-31H	N908JE	MIA	EWR		463	BH CW		2 7				
							Page Total	6/5	37 6		10 0		
							Amount Forward	6873 / 6471	10200 6	3 3	155 6	2176 8	80[illegible]
							Total to Date	6879 / 6476	10238 2	3 3	165 6	2176 8	80[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicop Landing
AUG 12	BHT-407	N491GM	TIST	TIST							3			3
13	B-727-31H	N908JE	TIST	EWR		465	LV CW		3 7				3 7	
15	G-1159B	N909JE	MIA	PBI		1942	LV		5				5	
16	B-727-31H	N908JE	EWR	VNY		466	LV BH		5 4				5 4	
16	"	"	VNY	ABQ		467	LV BH		1 7				1 7	
21	"	"	ABQ	MIA		468	LV BH		3 6				3 6	
21	"	"	MIA	TIST		469	LV BH		2 5				2 5	
27	"	"	TIST	EWR		470	LV BH		3 7				3 7	
29	G-1159B	N909JE	PBI	TEB		1943	LV	1/1	2 5				2 5	
30	"	"	TEB	HPN		1944	LV		5				5	
30	"	"	HPN	TIST		1945	LV		3 7				3 7	
SEP 6	B-727-31H	N908JE	EWR	PBI		471	LV CW		2 4				2 4	
18	G-1159B	N909JG	TIST	TEB		1955	LV		3 6				3 6	
30	B-727-31H	N908JE	TIST	EWR		474	LV BH		3 6				3 6	
OCT 4	"	"	EWR	LFPB		475	LV BH		7 0				7 0	
12	"	"	LFPB	LPAZ		476	LV BH		3 3				3 3	
12	"	"	LPAZ	TIST		477	LV BH		5 4				5 4	
15	"	"	TIST	EWR		478	LV BH		3 7				3 7	
18	G-1159B	N909JE	TEB	BED		1956	BH	1/1	1 0				1 6	
							Page Total	2/2	57 8		3		57 8	
							Amount Forward	6879 6476	10238 2	33	165 6	2176 8	8861 4	5
							Total to Date	6881 6478	16296 6	33	165 9	2176 8	8119 2	5 1

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

From ______ Matter/Sub-file ______ Instructions ______

Date ~~19~~ 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL	HELICOPTER LANDINGS
OCT 18	G-1159B	N909JE	BED	TIST		1957	BH		3 5				3 5	
25	"	"	EWR	TEST		1959	LV		3 6				3 6	
26	B-727-31H	N908JE	EWR	VQQ		479	LV BH		2 3				2 3	
NOV 6	G-1159B	N909JE	TIST	TEB		1962	LV	1/1	4 6				4 6	
8	"	"	TEB	TIST		1963	LV		3 8				3 8	
15	"	"	TEB	TIST		1965	BH		3 6				3 6	
17	"	"	TIST	BED		1968	BH	1/1	3 9				3 9	
17	"	"	BED	TEB		1969	BH	1/1	9				9	
21	"	"	TEB	TIST		1970	BH		3 5				3 5	
26	"	"	TIST	TEB		1971	LV		4 1				4 1	
DEC 2	"	SIMULATOR	DFW	DFW			NORM THOMPSON - INSTRUCTOR BRENT KIRBY, CREW HOLDING		4 0				4 0	
3	"	"	"	"			GUY GRONEY - INSTRUCTOR BRENT KIRBY, CREW		3 0				3 0	
11	"	N909JE	TIST	TEB		1976	LV		4 0				4 0	
13	"	"	TEB	PWM		1977	LV	1/1	1 0				1 0	
14	"	"	PWM	BED		1978	LV		8				8	
14	"	"	BED	TEB		1979	LV		1 1				1 1	
14	"	"	TEB	MIA		1980	LV		2 9				2 9	
18	"	"	TIST	PBI		1982	LV	1/1	2 8				2 8	
18	"	"	PBI	TEB		1983	LV		2 4				2 4	
							Page Total	5/5	55 1				55 1	
							Amount Forward	6881 6478	16296 0	3 3	165 9	2176 8	8119 2	514
							Total to Date	6886 6483	16351 1	3 3	165 9	2176 8	8174 3	514

I certify that the statements made by me on this form are true.

Pilot's Signature [signature: David Rodgers]

Instructions

Date 19 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL
DEC 21	G-1159B	N909JE	TEB	TIST		1984		LV		3 5				3 5
2008 JAN 6	"	"	TIST	TEB		1985		LV	1/1	3 9				3 9
11	"	"	TEB	TIST		1986		LV		3 5				3 5
16	B-727-200	SIMULATOR	MIA	MIA			BUTCH GRETCHEN - INSTRUCTOR JOE GLEESON CREW, MITCH-CREW			2 0				2 0
16	"	"	"	"			REY BARZANA - FE PC BUTCH GRETCHEN-CREW, MITCH-CREW			2 0				2 0
17	"	"	"	"			HAL LOKS - INSTRUCTOR BUTCH GRETCHEN-CREW HOLDING			2 0				2 0
18	"	"	"	"			REY BARZANA CAPT PC BUTCH GRETCHEN-CREW			2 0				2 0
26	G-1159B	N909JE	EWR	TEB		1991		LV		5				5
FEB 5	"	"	TIST	TEB		1993		BH	1/1	4 2				4 2
8	"	"	TEB	SAF		1994		BH		4				4 4
12	"	"	SAF	MIA		1995		LV	1/	3 7				3
13	"	"	MIA	TEB		1996		BH		2 4				2 4
15	"	"	TEB	TIST		1997		BH		3 4				3
24	"	"	TIST	TEB		1998		BH		4 0				4
27	"	"	TEB	BED		1999		LV		9				
27	"	"	BED	TEB		2000		LV		1 0				1
29	"	"	TEB	TIST		2001		LV		3 5				3
MAR 6	B-727-31H	N908JE	VQQ	VQQ		480		LV BH		1 6				1
8	G-1159B	N909JE	TEB	BED		2003		BH		8				
							Page Total		3/2	49 3				49
							Amount Forward		6886 6483	10351 1	3 3	165 9	2176 9	8174
							Total to Date		6889 6485	10400 4	3 3	165 9	2176 9	8223

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
MAR 8	G-1159B	N909JE	BED	TEB		2004	BH		1 0				1
8	"	"	TEB	ACY		2005	BH		6				
9	"	"	ACY	TEB		2006	BH	1/1	7				
10	B-727-31H	N908JE	VQQ	LCQ		481	BH LV		4				
16	G-1159B	N909JE	TIST	EWR		2010	LV		4 2				4
21	"	"	EWR	SSI		2011	LV		2 0				2
21	"	"	SSI	TIST		2012	LV		2 9				2
24	"	"	TIST	TEB		2013	LV	1/1	3 7				3
25	S-76	N908GM	MQS	RWI			LV		~~2 4~~		2 4		2
25	S-76	N908GM	RWI	HXD			LV				2 1		
26	"	"	HXD	DAB			LV	~~1/1~~					
26	"	"	DAB	PBI			LV				1 4		
28	G-1159B	N909JE	TEB	TIST		2014	LV		3 5				
APR 9	"	"	TIST	TEB		2016	BH		3 4				
15	"	"	TIST	TEB		2017	LV	1/1	3 7				
17	"	"	TEB	EINN		2018	LV		6 1				
18	"	"	EINN	LFPB		2019	LV		1 6				
22	"	"	LFPB	LLBG		2020	LV	1/	4 2				
25	"	"	LLBG	LGIR		2021	LV		1 5				
							Page Total	4/3	39 5		7 5		
							Amount Forward	6889 6485	10400 4	3 3	165 9	2176	8 82
							Total to Date	6893 6488	16439 9	3 3	173 4	2176	8 82

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 10 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
APR 25	G-1159B	N909JE	LGIR	LFPB		2622	LV		3 4				3 4
29	"	"	LFPB	CYJT		2623	LV	1/1	5 8				5 8
29	"	"	CYJT	TEB		2624	LV	1/1	2 5				2 5
MAY 17	"	"	TIST	TEB		2626	BH	1/1	4 1				4 1
22	"	"	TEB	TIST		2629	LV		3 5				3 5
23	BHT-467	N491GM	LSJ	TIST			LV				2		
26	"	"	LSJ	LSJ			NVH				2		
27	G-1159B	N909JE	TIST	TEB		2630	LV	1/1	3 8				3 8
29	B-727-31H	N908JE	PBI	LCQ		483	LV BH		9				9
29	G-1159B	N909JE	TEB	MIV		2631	BH		[illegible]				7
31	B-727-31H	N908JE	LCQ	VQQ		484	LV BH		4				4
JUN 11	G-1159B	N909JE	TIST	PDK		2634	BH	1/1	3 9				3 9
11	"	"	PDK	TEB		2635	BH	1/	1 9				1 9
JUL 2	B-727-31H	N908JE	VQQ	PBI		485	BH LV		9				9
AUG 18	B-727-200	SIMULATOR	MIA	MIA			RAY DARLANA - FE FC HAL LEXO-CREW, BUTCH GRETCHEN-CREW		2 0				2 0
OCT 21	G-1159B	N909JE	PBI	PBI		2043	LV		1 1				1 1
NOV 20	"	"	"	"		2044	LV	3/3	1 0				1 0
22	"	"	"	SEF		2045	LV		5				5
22	"	"	SEF	PBI		2046	LV		5				5
							Page Total	9/8	36 9		4		36 9
							Amount Forward	6893 6488	10439 9	3 3	173 4	2176 8	8263
							Total to Date	6902 6496	10476 8	3 3	173 8	2176 8	8300

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000093

Date ~~40~~ 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
DEC 9	B-727-31H	N908JE	PBI	LCQ		486			1 0				1 0
2009 JAN 5	G-1159B	SIMULATOR	DFW	DFW			STALLS, STEEP TURNS, CIRCLING APPROACH, MISSED APPROACH, V-1 CUT, HOT BLEED HOLDING		3 0				3 0
6	"	"	"	"			WINDSHEAR, RTO, NO FLAP LANDING, SE ILS SE GOAROUND, ELT HYD FAILURE		3 0				3 0
FEB 4	B-727-200	"	MIA	MIA			FE WARM UP HAL LEGO - INSTRUCTOR LV LM		1 5				1 5
4	"	"	"	"			FE PC - RAY BARZANA HAL LEGO LV LM		1 5				1 5
4	"	"	"	"			CAPTAIN WARMUP HAL LEGO INSTRUCTOR LV LM		1 5				1 5
4	"	"	"	"			CAPTAIN PC - RAY BARZANA LV LM		1 5				1 5
28	B-727-31H	N908JE	LCQ	PBI		487	LV LM	1/1	1 6				1 6
MAR 7	G-1159B	N909JE	PBI	MYNN		2048	LV		7				7
7	"	"	MYNN	PBI		2049	LV		8				8
MAY 7	B-727-31H	N908JE	PBI	PBI		488	LV LM		9				9
JUL 10	G-1159B	N909JE	PBI	PBI		2050	LV		9				9
13	"	"	PBI	PBI		2051	LV		7				7
SEP 25	B-727-200	SIMULATOR	MIA	MIA			LV LM		1 5				1 5
25	"	"	"	"					1 5				1 5
OCT 19	B-727-31H	N908JE	PBI	VQQ		489	LV LM	1/1	9				9
NOV 30	G-1159B	N909JE	PBI	PBI		2052	LV		1 2				1 2
2010 JAN 6	"	"	PBI	TEB		2053	LV		2 5				2 5
6	"	"	TEB	PBI		2054	LV		2 5				2 5
							Page Total	2/2	28 1				28 1
							Amount Forward	6902 6496	10476 8	3 3	173 8	2176 8	8300 0
							Total to Date	6904 6498	10504 9	3 3	173 8	2176 8	8328 1

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

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Instructions

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL
JAN 12	G-1159B	N909JE	PBI	TEB		2055		LV		2 9			
13	"	"	TEB	PBI		2056		LV		2 4			
15	"	"	PBI	TIST		2057		LV	1/1	2 4			
15 FEB	"	"	TIST	PBI		2058		LV		2 8			
1	"	"	PBI	TEB		2059		LV		2 4			
2	"	"	TEB	BED		2060		LV		9			
2	"	"	BED	TEB		2061		LV		9			
2	"	"	TEB	BCT		2062		LV		2 8			
5	"	"	BCT	TIST		2063		LV		2 3			
5	"	"	TIST	PBI		2064		LV		2 9			
10	G-1159A	SIMULATOR	DFW	DFW			HOLDING PATTERNS	WALT PLGNTS		3 4			
11	"	"	DFW	DFW			HOLDING	WALT PLGNTS		3 4			
16	G-1159B	N909JE	PBI	TIST		2065		LV	1/1	2 4			
16	"	"	TIST	PBI		2066		LV		2 9			
18	"	"	PBI	TEB		2067		LV	1/1	2 6			
19	"	"	TEB	PBI		2068		LV		2 6			
23	"	"	PBI	TEB		2069		LV	1/1	2 5			
24	"	"	TEB	PBI		2070		LV		2 8			
27	B-727-31H	N908JE	VQQ	PBI		490		LV LM		1 0			
							Page Total		4/4	46 3			
							Amount Forward		6904 6498	10504 9	3 3	173 8	2176 8
							Total to Date		6908 6502	1055 12	3 3	173 8	2176 8

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
MAR 2	G-1159B	N909JE	PBI	TEB		2671	LV	1/1	2 4				2 4
3	"	"	TEB	BCT		2672	LV		3 0				3 0
5	"	"	BCT	TIST		2673	LV	/1	2 3				2 3
5	"	"	TIST	PBI		2674	LV		2 9				2 9
15	B-727-200	SIMULATOR	MIA	MIA			FE RECURRENT RAY BARZANAN LV HAL LGXO		1 5				1 5
15	"	"	"	"			HOLDING CAPT RECURRENT RAY BARZANAB LV HAL LGXO		1 5				1 5
22	G-1159	N530GA	PBI	PTK			JOHN ROBERTS		2 4				2 4
25	G-1159B	N909JE	PBI	TEB		2075	LV	1/1	2 5				2 5
26	"	"	TEB	PBI		2076	LV		2 6				2 6
29	"	"	PBI	TIST		2077	LV	/1	2 3				2 3
29	"	"	TIST	PBI		2078	LV		2 9				2 9
APR 7	"	"	PBI	TEB		2079	LV	1/1	2 4				2 4
8	"	"	TEB	PBI		2080	LV		2 7				2 7
19	"	"	PBI	BED		2081	LV	1/1	2 6				2 6
19	"	"	BED	TEB		2082	LV		9				9
20	"	"	TEB	PBI		2083	LV		2 6				2 6
29	"	"	PBI	TEB		2084	LV	1/1	2 6				2 6
30	"	"	TEB	PBI		2085	LV		2 5				2 5
MAY 2	B-727-200	SIMULATOR	MIA	MIA			BILL HAMMOND CHECKRIDE LV BH		1 5				1 5
							Page Total	5/7	44 1				44 1
							Amount Forward	6908 6502	10551 2	3 3	173 8	2176 8	8374 4
							Total to Date	6913 6509	10595 3	3 3	173 8	2176 8	8418 5

I certify that the statements made by me on this form are true.

Pilots Signature David Rodgers

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Instructions

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	ME
MAY 6	B-727-31H	N908JE	PBI	PBI		491	LV BH		1 5				
13	G-1159B	N909JE	PBI	TIST		2086	BH	1/1	2 4				
13	"	"	TIST	PBI		2087	BH	1/1	2 5				
20	"	"	PBI	TEB		2088	LV	1/1	2 5				
21	"	"	TEB	PBI		2089	LV		2 4				
31	"	"	PBI	TIST		2090	LV	1/1	2 4				
31	"	"	TIST	PBI		2091	LV		2 7				
JUN 2	"	"	PBI	TEB		2092	LV	1/1	2 4				
3	"	"	TEB	PBI		2093	LV		2 7				
9	"	"	PBI	TIST		2094	LV	1/1					
9	"	"	TIST	PBI		2095	LV		2 5				
10	"	"	PBI	TEB		2096	LV	1/1	2 5				
11	"	"	TEB	PBI		2097	LV		2 4				
17	"	"	PBI	TEB		2098	LV	1/1	2 5				
18	"	"	TEB	PBI		2099	LV		2 4				
29	B-727-200	SIMULATOR	MIA	MIA			LARRY MORRISON 6 MONTH CHECK LV EM		1 5				
JUL 1	G-1159B	N909JE	PBI	TIST		2102	LV	1/1	2 6				
2	"	"	TIST	PBI		2103	LV		2 6				
15	"	"	PBI	TIST		2106	LV	1/1	2 5				
							Page Total	10/10	45 5				
							Amount Forward	6913 6509	10595 3	3 3	173 8	2176	8 8
							Total to Date	6923 6519	10640 8	3 3	173 8	2176	8 8

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL	HELICOPTER LANDINGS
JUL 16	G-1159B	N909JE	TIST	BCT		2107	LV		2 6				2 6	
20	"	"	BCT	TEB		2108	LV		2 4				2 4	
25	"	"	TEB	LFPB		2109	LV		7 2				7 2	
AUG 2	"	"	LFBB	CYQX		2110	LV	1/1	5 7				5 7	
2	"	"	CYQX	TEB		2110	LV	1/	2 8				2 8	
25	"	"	TEB	PHX		2116	LV	1/1	4 7				4 7	
25	"	"	PHX	ABQ		2117	LV	1/	9				9	
30	"	"	ABQ	TEB		2118	LV		3 8				3 8	
SEP 2	"	"	TEB	TIST		2119	LV	1/	3 7				3 7	
12	"	"	TIST	BED		2120	LV		4 0				0	
12	"	"	BED	TEB		2121	LV		1 0				1 0	
19	"	"	TEB	TIST		2122	LV	1/1	3 7				3 7	
21	"	"	TIST	TEB		2123	NADIA MARCINKOVA FLEW IN THE RIGHT SEAT, I SAT ON JUMPSEAT LV		0				0	
26	"	"	TEB	EGGP		2124	DIVERTED TO ALTERNATE LV	/1	6 5				6 5	
27	"	"	EGGP	EGGW		2125	LV	1/1	7				7	
29	"	"	EGGW	LFPB		2126	LV		1 1				1 1	
OCT 18	"	"	LFPB	EGGW		2127	DIVERTED TO EGGW BEFORE ENTERING TRACKS, CRACKED DV WINDOW LV	1/1	2 8				2 8	
19	"	"	EGGW	BGR		2128	EMPTY LV		6 8				6 8	
19	"	"	BGR	TEB		2129	EMPTY LV		1 4				1 4	
							Page Total	8/6	61 8				61 8	
							Amount Forward	6923 / 6519	6646 8	33	173 8	2176 8	8464 0	517
							Total to Date	6931 / 6525	10702 6	33	173 8	2176 8	8525 8	517

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Pilot's Signature David Rodgers

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter
OCT 24	G-1159B	N909JE	TEB	TIST		2130		LV	1/1	3 5				3 5	
27	B-727-31H	N908JE	PBI	PBI		492		LV EM	3/3	1 7				1 7	
29	G-1159B	N909JE	TIST	EWR		2131		LV		3 6				3 6	
29	"	"	EWR	CPS		2132	EMPTY	LV		2 2				2 2	
NOV 30	"	"	CPS	TEB		2133	EMPTY	LV	1/1	2 0				2 0	
DEC 7	"	"	TEB	ABQ		2134		LV		4 0				4 0	
13	"	"	ABQ	TEB		2135		LV	1/	3 7				3 7	
19	"	"	TEB	TIST		2136		LV		3 8				3 8	
30	"	"	TIST	TEB		2137		LV	1/	4 0				4 0	
2011 JAN 6	"	"	TEB	TIST		2138		LV		3 7				3 7	
17	"	"	TIST	PBI		2139		LV	1/1	2 9				2 9	
18	"	"	PBI	TEB		2140		LV		2 4				2 4	
FEB 2	G-1159A	SIMULATOR	DFW	DFW			HOLDING			2 0				2 0	
2	"	"	"	"						2 0				2 0	
3	"	"	"	"			HOLDING		3/3	2 0				2 0	
3	"	"	"	"						2 0				2 0	
6	G-1159B	N909JE	TEB	TIST		2141			1/	3 5				3 5	
10	G-1159SP	N530GA	PBI	TEB			JOHN ROBERTS			2 4				2 4	
13	G-1159B	N909JE	TEB	BED		2143		LV	1/1	9				9	
							Page Total		13/10	52 3 (67 9)				52 3	
							Amount Forward		6931 / 6525	6702 6	33	173 8	2176	8 8525 8	51
							Total to Date		6944 / 6535	6754 9	33	173 8	2176	8 8578 1	51

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL
FEB 13	G-1159B	N909JE	BED	PBI		2144	LV		2 7				2 7
16	"	"	PBI	TIST		2145	LV		2 4				2 4
18	S-76C++	N722JE	TIST	LSJ			LV		-3		3		-3
19	"	"	LSJ	TISX			LV		-3		3		-3
19	"	"	TISX	LSJ			LV				3		-3
19	"	"	LSJ	TIST			LV				1		
20	"	"	TIST	LSJ			LV				1		
20	"	"	LSJ	TIST			LV				1		
20	G-1159B	N909JE	TIST	TEB		2146	LV	1/	4 2				4 2
26	"	"	TEB	ABQ		2147	LV		5 0				5 (
MAR 1	"	"	ABQ	LGB		2148	LV	1/1	1 0				1 c
4	"	"	LGB	ABQ		2149	LV		1 6				1 t
10	"	"	ABQ	CPS		2150	LV	1/1	2 2				2
26	"	"	CPS	TEB		2151	LV		1 8				1
26	"	"	TEB	TIST		2152	LV		3 4				3
27	"	"	TIST	MDPC		2153	LV	1/1	8				
27	"	"	MDPC	TIST		2154	LV	1/1	8				
27	"	"	TIST	MDPC		2155	LV	1/1	9				
28	"	"	MDPC	TIST		2156	LV		9				
							Page Total	6/5	28 6		1 2		28
							Amount Forward	6944 6535	10754 9	3 3	173 8	2176 8	8578
							Total to Date	6950 6540	10783 5	3 3	175 0	2176 8	8606

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
MAR 29	G-1159B	N909JE	TIST	TEB		2157	LV	1/	4 1				4 1
30	S-76C++	N722JE	TEB	4N1			TWA CONSTELLATION TURNGO INTO A RESTAURANT G.RENSTRA LV				3		
30	"	"	4N1	TEB			GEORGE RENSTRA LV				3		
30	"	"	TEB	POU							8		
APR 13	B-727-200	SIMULATOR	SFB	SFB			DICK GARDA-INSTRUCTOR BILL DAVIDSON-CREW BARRY-CREW [illegible]		2 0				2 0
13	"	"	"	"			DICK GARDA-INSTRUCTOR BILL DAVIDSON-CREW BARRY CREW		2 0				2 0
14	"	"	"	"			SAME AS ABOVE CAPT CHECK KEN PERROZ - FAA EXAMINER		2 0				2 0
14	"	"	"	"			SAME AS ABOVE FE CHECK		2 0				2 0
26	B-727-31H	N908JE	PBI	BOK			JIM POWELL LV		1 2				1 2
30	G-1159B	N909JE	TIST	TEB		2159	LV	1/1	3 8				3 8
MAY 14	"	"	TEB	LFPB		2160	LV		7 4				7 4
16	"	"	LFPB	GOOY		2161	LV	1/1	6 3				6 3
20	"	"	GOOY	GVAC		2162	LV		1 2				1 2
20	"	"	GVAC	TIST		2163	LV		6 4				6 4
22	"	"	TIST	TEB		2164	LV	1/1	4 1				4 1
JUN 6	BHT-407	N491GM	PBI-F45-PBI				RANDY ROWLES - EXAMINER BELL SCHOOL				1 6		
8	"	"	PBI-LNA-PBI				SAME AS ABOVE FULL DOWN AUTOS				1 4		
26	G-1159B	N909JE	TIST	TGB		2166	LV	1/1	4 0				4 0
30	"	"	TEB	PBI		2167	LV		2 4				2 4
							Page Total	5/4	48 9		4 4		48 9
							Amount Forward	6950 / 6540	10783 5	3 3	175 0	2176 8	8606 7
							Total to Date	6955 / 6544	10832 4	3 3	179 4	2176 8	8655 6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter Landings	Condition XC
JUL 4	G-1159B	N909JE	PBI	TEB		2168		LV	1/1	2 4				2 4		2
9	"	"	TEB	ASE		2169		LV		3 9				3 9		3
9	"	"	ASE	ABQ		2170		LV		1 2				1 2		1
14	"	"	ABQ	BFI		2171		LV	1/1	2 8				2 8		2
15	"	"	BFI	APC		2172		LV		1 6				1 6		1
17	"	"	APC	TEB		2173		LV	/1	5 1				5 1		5
19	"	"	TEB	TIST		2174		LV		3 5				3 5		3
20	"	"	TIST	TEB		2175		LV	1/1	4 0				4 0		4
25	B-727-200	SIMULATOR	MIA	MIA			CAPTAIN WARMUP HOLDING			2 0				2 0		
25	"	"	"	"			FG WARMUP			2 0				2 0		
26	"	"	"	"			CAPTAIN CHECK RIDE PART 125 HARRY BROWN - GTAM INGR. HOLDING			1 0				1 0		
26	"	"	"	"			FE CHECK RIDE PART 125 HARRY BROWN - G.I.M.S.NGR			1 0				1 0		
28	G-1159B	N909JE	TEB	PBI		2176	1 SAT ON JUMP SEAT			0				0		
28	"	"	PBI	PBI		2177	3 TAKE TAKE-OFF + LANDINGS FOR NADER MARCINKO FROM THE LEFT SEAT		3/3	1 1				1 1		
AUG 3	B-727-31H	N908JE	BQK	PBI		494		LV LM	1/1	1 1				1 1		1
31	BHT-407	N491GM	TIST	LSJ				LV	~~1/1~~			3			1	
31	"	"	LSJ	LSJ				LV	~~8/8~~			7			8	
SEP 4	G-1159B	N909JE	SWF	TIST		2180		LV NM	1/	3 9				3 9		
13	"	"	TEB	TIST		2182		LV	1/	3 8				3 8		
								Page Total	9/8	40 4		1 0		40 4	9	
								Amount Forward	6955 6544	10832 4	3 3	179 4	2176 8	8655 6	536	917
								Total to Date	6964 6552	10872 8	3 3	180 4	2176 8	8696 0	545	920

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter Landings	Co
NOV 21	B-727-200	SIMULATOR	MIA	MIA			FG CHECK RIDE PART 125 LV		1.0				1.0		
25	"	"	"	"			CAPTAIN PC REY BALZAND HOLDING LM		2.0				2.0		
DEC 1	B-727-31H	N908JE	PBI	PBI		495	RVSM TEST FLIGHT LV LM		1.6				1.6		
3	"	"	PBI	PBI		496	DEMO FLIGHT FOR QATAR ENTOURAGE LV LM	1/1	1.1				1.1		
13	"	"	PBI	VQQ		497	MAINTENANCE LV LM		.9				.9		
2012 JAN 8	G-1159B	N909JE	TEB	MHT		2193	LV	1/1	.9				.9		
8	"	"	MHT	LFPB		2194	LV	/ 1	6.1				6.1		
16	"	"	LFPB	GMMX		2195	LV		3.0				3.0		
17	"	"	GMMX	DIAP		2196	LV	1/1	4.2				4.2		
18	"	"	DIAP	GVAC		2197	LV		3.6				3.6		
18	"	"	GVAC	TIST		2198	LV		7.1				7.1		
23	BHT-407	N491GM	LSJ	TIST			LV				2			1	
24	G-1159B	N909JE	TIST	PBI		2199	LV		2.9				2.9		
FEB 12	G-1159A	SIMULATOR	DFW	DFW			FMS APPROACHES, FMS HOLDING, COLD WX STALLS, NO FLAP LANDING, HOLDING		3.0				3.0		
13	"	"	"	"			HIGH ALT OPERATIONS, EMERGENCY DESCENT, RTO, ED LACKEY-GREGG CFI		2.0				2.0		
MAR 6	B-727-31H	N908JE	VQQ	VQQ		498	LV JIM BORTIKOWSKY	[signature]	.5				.5		
6	"	"	VQQ	PBI		498	LV JB		.9				.9		
16	"	"	PBI	JFK		499	LV JB		2.4				2.4		
17	"	"	JFK	LFPB		500	LV JB		7.5				7.5		
							Page Total	3/4	50.7		2		50.7	1	
							Amount Forward	6964 6552	10872.8	3.3	180.4	2176.8	8696.0	545	
							Total to Date	6967 6556	10923.5	3.3	180.6	2176.8	8746.7	546	

I certify that the statements made by me on this form are true.

Pilot's Signature [signature: David Rodgers]

Date 2012	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter
MAR 19	B-727-31H	N908JE	LFPB	EGHL		501	LASHAM MAINT	1/1	1 0				1 0	
APR 18	G-1159B	N909JE	TEB	TIST		2207	LV		3 7				3 7	
30	B-727-200	SIMULATOR	MIA	MIA			WARM UP AS CAPTAIN AND FLIGHT ENGINEER HOLDING LV		4 0				4 0	
MAY 1	"	"	"	"			CAPT & ENG FE PC HOLDING LV HARRY BROWN-GXDMSNGR JDG BRYANT		4 0				4 0	
3	G-1159B	N909JE	TIST	PBI		2208	LV		2 7				2 7	
4	"	"	PBI	TEB		2209	LV	1/1	2 5				2 5	
JUL 8	"	"	TEB	TIST		2212	LV		3 5				3 5	
20	"	"	TIST	TIST		2213	LV	3/3	2				2	
21	"	"	TIST	TEB		2214	LV	1/1	3 8				3 8	
26	"	"	TEB	PBI		2215	LV		2 4				2 4	
30	"	"	PBI	CNW		2216	LV	1/1	2 4				2 4	
30	"	"	CNW	ABQ		2217	LV	1/1	1 5				1 5	
AUG 5	"	"	ABQ	SFO		2218	LV		2 3				2 3	
6	"	"	SFO	ABQ		2219	LV		2 1				2 1	
18	"	"	ABQ	TEB		2220	LV		3 6				3 6	
22	"	"	TEB	IAD		2221	LV	1/1	9				9	
22	"	"	IAD	PBI		2222	LV	1/	2 3				2 3	
26	"	"	PBI	TIST		2223	LV		2 6				2 6	
SEP 6	"	"	TIST	TEB		2224	LV	1/	3 8				3 8	
							Page Total	11/9	49 3				49 3	
							Amount Forward 6967	6556	10923 5	3 3	180 6	2176	8 8746 7	5
							Total to Date	6978 6565	10972 8	3 3	180 6	2176	8 8796 0	5

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000104

Date 2012	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL
SEP 13	G-1159B	N909JE	TEB	ABQ		2225	LV		4 1				4
18	"	"	ABQ	ONT		2226	LV	1/1	1 6				1
19	"	"	ONT	TEB		2227	LV		4 8				4
28	"	"	TEB	PBI		2228	LV	1/1	2 5				2
OCT 1	"	"	PBI	TIST		2229	LV		2 6				2
6	"	"	TIST	TEB		2230	LV	1/	3 7				3
24	B-727-31H	N908JE	EGHL	EGSS		502	LASHAM TO STANSTED LV JIM BARCZEWSKI		7				
28	G-1159B	N909JE	TEB	TIST		2231	LV	1/1	3 9				3
NOV 12	B-727-200	SIMULATOR	MIA	MIA			FE PC MARCELLO MARINO LV CHRIS HIGGINS		2 0				2
12	"	"	"	"			CAPTAIN PC HOLDING HARRY BROWN LV CHRIS HIGGINS		2 0				2
20	G-1159B	N909JE	TEB	PBI		2235	LV		2 5				2
25	"	"	PBI	MDW		2236	LV		2 8				2
26	"	"	MDW	TEB		2237	LV		1 6				1
DEC 6	B-727-31H	N908JE	EGSS	EGSS		503	LV CH	1/1	7				
7	"	"	EGSS	JFK		504	LV CH		8 2				
14	"	"	JFK	TIST		505	LV CH	1/	3 7				
2013 JAN 10	"	"	TIST	PBI		506	LV CH		2 8				
17	G-1159B	N909JE	TEB	PBI		2239	LV		2 9				
21	"	"	PBI	TEB		2240	LV		2 7				
							Page Total	6/4	55 8				
							Amount Forward	6978 6565	10972 8	3 3	180 6	2176	887
							Total to Date	6984 6569	11028 6	3 3	180 6	2176	888

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2013	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	...and Class SEL
FEB 7	B-727-31H	N908JE	PBI	BQK		507	LV CH	1/1	1 1			
13	G-1159A	SIMULATOR	DFW	DFW			RICKY GREAVES - INSTRUCTOR HOLDING JOE FERNANDEZ		2 0			
14	"	"	"	"			SAME AS ABOVE HOLDING	3/3	2 0			
16	G-1159B	N909JE	TEB	PBI		2245	LV	1/1	3 0			
18	"	"	PBI	TEB		2246	LV	●	2 8			
22	"	"	TEB	ABQ		2247	LV	1/	4 9			
24	"	"	ABQ	LGB		2248	LV		1 7			
26	"	"	LGB	TEB		2249	LV		4 8			
MAR 1	"	"	TEB	PBI		2250	BILL GATES LV		2 5			
19	"	"	TIST	TEB		2252	LV	1/1	4 2			
APR 5	"	"	TEB	TIST		2256	LV	1/1	3 6			
21	"	"	TIST	TEB		2257	LV	1/1	3 5			
25	"	"	TEB	ASE		2258	LV	1/1	4 3			
25	"	"	ASE	ABQ		2259	LV	1/1	1 0			
25	"	"	ABQ	TUL		2260	LV	1/1	1 3			
29	"	"	TUL	VNY		2261	LV		3 0			
30	"	"	VNY	TEB		2262	LV	1/	4 9			
MAY 6	"	"	TEB	TIST		2263	LV		3 8			
12	"	"	TIST	PBI		2264	BILL MURPHY	1/1	2 7			
							Page Total	14/12	51 4			
							Amount Forward	6984 / 6569	11028 6	3 3	180 6	2176 8
							Total to Date	6998 / 6581	11086 0	3 3	180 6	2176 8

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2013	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
MAY 15	G-1159B	N909JE	PBI	TIST		2265	LV		2 3				2 3
22	"	"	TIST	ISP		2266	DARREN ROYHELL [redacted]	1/1	3 6				3 6
24	"	"	ISP	TEB		2267	LV	1/1	8				
24	"	"	TEB	TIST		2268	LV	1/	3 7				3
JUN 3	"	"	TIST	ISP		2269	LV		3 9				3
6	"	"	ISP	LFPB		2270	LV	/1	7 0				7
15	"	"	LFPB	LPAZ		2271	LV		3 9				3
16	"	"	LPAZ	TIST		2272	LV		5 6				5
24	"	"	TIST	TEB		2273	LV	1/1	3 9				3
JUL 17	"	"	TIST	TEB		2276	BILLY DIMAURO	1/1	3 8				3
19	"	"	TEB	BED		2277	LV		9				
19	"	"	BED	TIST		2278	LV		3				3
25	"	"	TIST	PBI		2279	LV	1/1	2 6				2
26	"	"	PBI	TEB		2280	LV		2 5				2
AUG 1	"	"	TEB	ABQ		2281	BILLY DIMAURO	1/1	4 2				4
3	"	"	ABQ	LAS		2282	BD	1/1	1 3				1
4	"	"	LAS	ABQ		2283	BD	1/1	1 4				1
7	"	"	ABQ	ASE		2284	BD	1/1	1 1				1
7	"	"	ASG	BFI		2285	BD	1/1	2 2				2
							Page Total	16/11	58 4				58
							Amount Forward	6998 6581	11086 0	33	180 6	2176 8	890
							Total to Date	7009 6592	11144 4	33	180 6	2176 8	896

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

EXHIBIT CC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

---x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

June 3, 2016
9:07 a.m.

C O N F I D E N T I A L

Deposition of DAVID RODGERS, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

2
3 A P P E A R A N C E S:
4 BOIES SCHILLER & FLEXNER, LLP
Attorneys for Plaintiff
5 401 East Las Olas Boulevard
Fort Lauderdale, Florida 33301
6 BY: BRADLEY EDWARDS, ESQ.
7
8 HADDON MORGAN & FOREMAN, P.C.
Attorneys for Defendant
9 150 East 10th Avenue
Denver, Colorado 80203
10 BY: JEFFREY PAGLIUCA, ESQ.
11
12
13 ALSO PRESENT: Sandy Perkins, Paralegal
Boies Schiller & Flexner
14
Ryan Kick, Videographer
15
16
17
18
19
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21
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23
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3 I N D E X

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8 E X H I B I T S

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23

24

25

1 DAVID RODGERS
2 A. Yes.
3 Q. Can you -- can you tell me -- I have been
4 provided by your attorney a -- what has been
5 represented to be a copy, a direct copy of that
6 logbook. And I'm going to mark this as
7 Plaintiff's 1. I just want you to confirm that this
8 is an accurate copy of the original logbook that you
9 brought to your deposition today.
10 A. Yes.
11 MR. REINHART: Let him show it to you.
12 BY MR. EDWARDS:
13 Q. There you go.
14 (The referred-to document was marked by
15 the court reporter for Identification as
16 Deposition Exhibit 1.)
17 MR. REINHART: It is not a copy of the
18 entire book. It is the time period that was
19 covered by the subpoena. I just want to make
20 clear the book covers the time period outside
21 the subpoena.
22 MR. EDWARDS: Okay. I will let him
23 clarify that, of course, too.
24 THE WITNESS: Yes. It is logbook. It is
25 not 40 years, but it is my logbook.

1 DAVID RODGERS
2 BY MR. EDWARDS:
3 Q. Okay. You can keep this -- that down
4 there --
5 A. Okay.
6 Q. -- so we can keep track of the exhibits.
7 A. Okay.
8 Q. So does the copy that you just went
9 through, is that an exact copy of the original
10 logbook from the November 1995 date through, it
11 looks like, September 2013? That period of time?
12 A. Yes.
13 Q. Okay. And what is this book? What do you
14 call the book?
15 A. It is called the standard pilot master
16 log.
17 Q. All right. And who made the various
18 entries in the book?
19 A. I did.
20 Q. When did you make --
21 MR. PAGLIUCA: Brad, can you hang on for
22 one second.
23 MR. EDWARDS: Sure.
24 MR. PAGLIUCA: You said September 2013, I
25 thought.

1 DAVID RODGERS
2 MR. EDWARDS: That is what I have on the
3 last page.
4 MR. PAGLIUCA: My last page is 2008 on
5 this copy, 093 Bates label.
6 MR. REINHART: There's 108 pages to the
7 exhibit.
8 MR. PAGLIUCA: I'm missing the last 8
9 pages. That is why.
10 MS. PERKINS: Do you want the last copy?
11 What is your last page?
12 MR. PAGLIUCA: Ninety-three is my last
13 page.
14 That is why I only go through '08.
15 MS. PERKINS: So I will give you my '94 to
16 the end. That should give you a complete. Oh,
17 you're looking -- which one are you looking at,
18 the new one or the old one?
19 MR. EDWARDS: The one through '08.
20 MR. PAGLIUCA: Okay.
21 MR. EDWARDS: Okay. Are you ready, Jeff?
22 MR. PAGLIUCA: Yes.
23 BY MR. EDWARDS:
24 Q. When did you make each individual entry?
25 A. It could have been on that date that it

1 DAVID RODGERS

2 says. It could have been possibly a later date.

3 Most likely, fairly close to that date.

4 Q. Okay. How did you make sure that the log

5 entries that you were creating were accurate?

6 A. Well, people get on the airplane and I see

7 who the people are, and I put them down there.

8 Q. Okay. So you are making the notation at

9 or around the time that you are making this

10 observation -- the observations?

11 A. Correct.

12 Q. And you are recording the data accurately

13 in your logbook?

14 A. As accurately as I can.

15 Q. Okay.

16 A. Yes.

17 Q. Can we just look at the first page of the

18 exhibit?

19 A. Uh-huh.

20 Q. And if you could walk me through, let's

21 just take the first line.

22 A. Uh-huh.

23 Q. In the top left corner, there is a date.

24 A. Correct.

25 Q. And it says, "NOV '95." Is that you

1 DAVID RODGERS
2 indicating that this is November 1995?
3 A. Yes.
4 Q. Okay. And the first line under that in
5 the date column says 17. Is that November 17th,
6 1995?
7 A. Yes.
8 Q. Is that a notation that you would have
9 made on November 17th, 1995?
10 A. Yes.
11 Q. And the next column over under "aircraft
12 make and model," there is a number there. What is
13 that number?
14 A. That's the model of aircraft we're flying.
15 It's a G-1159B. It is Gulfstream, II-B aircraft.
16 Q. Okay. And then the next column over,
17 aircraft identification mark?
18 A. It is the registration number of the
19 aircraft.
20 Q. And what is the registration number? What
21 does that mean?
22 A. The number that is on the side of every
23 aircraft to identify what country it is from and
24 what particular airplane it is in that country. The
25 N means United States.

1 DAVID RODGERS
2 Q. And is that number unique to the aircraft?
3 A. Yes.
4 Q. So there is no other aircraft at the same
5 time bearing the identification number in N908JE?
6 A. That's correct.
7 Q. Who picks the identification number? I
8 understand N means United States.
9 A. Right.
10 Q. Who picks the 908JE?
11 A. It depends -- some aircraft, I mean, when
12 you get them, they already have the number on there,
13 and so that would be one way. Sometimes the
14 manufacturer puts them on there.
15 You can also request a certain number, if
16 you so chose to do so.
17 Q. Okay. The particular air -- these
18 particular logs were produced in a -- as a
19 consequence of a subpoena issued in the case of
20 Virginia Roberts Giuffre versus Ghislaine Maxwell.
21 A. Uh-huh.
22 Q. Is that your understanding?
23 A. Yes.
24 Q. And the period of time that we were
25 produced -- I understand you have flown for 40

1 DAVID RODGERS
2 years. The period of time -- or that is evidenced
3 by this logbook is '95 through 2013.
4 Why was it that period of time that was
5 chosen?
6 A. Because that is what the subpoena
7 requested.
8 Q. Okay. Is that when you started flying for
9 Jeffrey Epstein?
10 A. No.
11 Q. When did you start flying for Jeffrey
12 Epstein?
13 A. July of 1991.
14 Q. Okay. Do you have available today the
15 entries going back as far as July 1991?
16 A. I don't know. I have to look and see.
17 Q. Okay.
18 A. No. Because this is from 7/28 of '94.
19 Q. Okay. So that particular logbook begins
20 July 28th, 1994?
21 A. Yes.
22 Q. And were you privately flying for Jeffrey
23 Epstein on November 17th, 1995?
24 A. Yes.
25 Q. And is that Gulfstream that you described

1 DAVID RODGERS
2 a Jeffrey Epstein owned or controlled airplane?
3 A. It was -- let me think.
4 This was 908 Juliet, Echo -- I believe it
5 was owned by Hyperion Air, Inc., I believe.
6 Q. And is Hyperion Air, to your
7 understanding, a company associated with Jeffrey
8 Epstein?
9 A. As far as I know. I mean, I would assume
10 so, but --
11 Q. Was Jeffrey Epstein your primary
12 passenger --
13 A. Yes.
14 Q. -- on that airplane?
15 A. Yes.
16 Q. And who was the individual that gave you
17 direction as to what passengers to let on and off
18 the airplane and where to fly, et cetera?
19 A. Well, Jeffrey was usually -- I mean,
20 almost always on the airplane, unless we were going
21 to maintenance. And so when he got there, he would
22 have the people with him.
23 Q. Okay. So going back to the aircraft
24 identification mark, 908JE, does the JE signify the
25 initials of Jeffrey Epstein?

1 DAVID RODGERS
2 A. I would assume so.
3 Q. Okay.
4 A. But technically they are actually the
5 phonetic letters that we use. But technically it is
6 Juliet echo; it is not Jeffrey Epstein. As far as
7 radio phraseology, we don't answer Jeffrey Epstein;
8 we answer Juliet.
9 Q. Okay. But the JE doesn't signify some
10 jurisdictional code?
11 A. No.
12 Q. It is -- it is chosen by the owner of the
13 aircraft?
14 A. Right. Right.
15 Q. So as his pilot and as Jeffrey Epstein
16 being the main passenger, you have presumed that JE
17 signifies his initials?
18 A. I would assume so.
19 Q. In fact, we will get to it later down the
20 road, but the -- the other plane also bears the
21 ending initials JE; is that right?
22 A. Yes.
23 And this N number that's on this airplane
24 was eventually switched to another airplane.
25 Q. To the Boeing?

1 DAVID RODGERS
2 A. To the Boeing, correct.
3 Q. Okay.
4 So if we go back to this first entry, the
5 next column says, "From CMH."
6 A. Yes.
7 Q. And what is that?
8 A. Columbus, Ohio.
9 Q. That is an airport code?
10 A. Airport identifier.
11 Q. And, again, that airport code is unique to
12 a particular airport?
13 A. Correct.
14 Q. The next is "To PBI"?
15 A. Yes.
16 Q. Where is that?
17 A. West Palm Beach.
18 Q. And flight number? The next column says
19 "Miles Flown."
20 A. Right.
21 Q. That is not something that you log.
22 A. I don't.
23 Q. You kept pretty meticulous logs.
24 So the next column is flight log -- or
25 flight number?

1 DAVID RODGERS
2 Q. Okay.
3 A. But I'm not even sure we still had it at
4 this point in time.
5 Q. Yeah. It shows up on the next page. We
6 will get there.
7 A. Does it? Okay.
8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.
11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --
15 MR. PAGLIUCA: Object to foundation.
16 BY MR. EDWARDS:
17 Q. -- based on your knowledge or your logs or
18 anything else?
19 A. No, I wouldn't have any way of knowing.
20 Q. Okay.
21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.
24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

1 DAVID RODGERS
2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.
6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?
9 A. Yes.
10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?
13 A. Yes, right.
14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.
19 A. Right. Right.
20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?
23 A. Correct.
24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

2 Boeing?

3 A. Yes.

4 Q. The Boeing, was that previously owned by

5 The Limited or Les Wexner?

6 A. I'm not sure of the company name,

7 officially. But probably, yes.

8 Q. Some association with him?

9 A. Some association, yes.

10 Q. Do you know who flew the Gulfstream while

11 you were doing the simulator?

12 A. Well, it would have been Larry Visoski,

13 I'm not sure who the first officer was.

14 Q. Do you know if any logs were kept of the

15 passengers' names?

16 A. While I was at school?

17 Q. Right, while you were at school.

18 A. There probably were logs, but I don't know

19 where they are.

20 Q. Have you ever spoken with Larry about

21 whether he kept names of passengers?

22 A. I don't think he does.

23 Q. Do you know where Larry Visoski flew the

24 Gulfstream for the month that you were --

25 A. No.

1 DAVID RODGERS
2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.
6 Q. Okay. Got it.
7 And then where do you go the next day?
8 A. We went from Stephenville to
9 Paris-Le Bourget.
10 Q. And who were the passengers going to
11 Paris?
12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.
14 Q. And then what's the next flight?
15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.
17 Q. Granada, Spain?
18 A. Granada, Spain. Correct.
19 Q. Okay. And who are the passengers on that
20 trip?
21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.
24 Q. And then what's the next flight?
25 A. From there to Tangiers. From Granada to

1 DAVID RODGERS

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5

I, the undersigned authority, certify
6 that DAVID RODGERS personally appeared before
me and was duly sworn.
7 WITNESS my hand and official seal
this 8th day of June, 2016.

8

9

Kelli Ann Willis, RPR, CRR
10 Notary Public, State of Florida
Commission FF928291, Expires 2-16-20
11 + + + + + + + + + + + + + + + + + +

12 CERTIFICATE

13 STATE OF FLORIDA)

14 COUNTY OF MIAMI-DADE)

15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of DAVID RODGERS; that a
review of the transcript was not requested; and
18 that the transcript is a true record of my
stenographic notes.
19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.
22 Dated this 8th day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25

EXHIBIT DD

INTENTIONALLY LEFT BLANK

EXHIBIT EE

```
Date:  4/25/16          ROYAL PALM BEACH POLICE DEPARTMENT          Page:        1
Time:  8:51:56               Citation Tracking Report            Program: CMS307L

Case Number   . : 1-02-009702
Issued By   . . : KLOEPPING, KURT  6/19/02 13:55
Entry Employee  : STEPNOWSKI, DOROTHY  6/24/02 13:55
Zone/Division   : Zone Two (2) (So of Okee/E thr Wil)
District . . .  : PATROL
Street Name   . :  CRESTWOOD BL /SPARROW
Last Name   . . : ROBERTS, VIRGINIA LEE
Street Number   : [REDACTED] RD
City . . . . .  : LOXAHATCHEE, FL 33470
Birth Date . .  : [REDACTED]          Oper Lic No. . : [REDACTED]
Race . . . . .  : White               Sex  . . . . . : Female

********** V E H I C L E   I N F O R M A T I O N  #  1 *********************
Case Number   . : 1-02-009702         License Number : G13BTQ  FL
Vehicle Year .  : 1993                Make . . . . . : PONTIAC
Style  . . . .  : TWO DOOR            Color - Top  . : White
Color - Bottom  : White

********** V I O L A T I O N   I N F O R M A T I O N  #  1 *******************
Case Number   . : 1-02-009702         Citation Number: 9702BOE5
Statute/Ordin   : 316.189 1           ?????  . . . . : NA

* * * * * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * * * * *
```

CERTIFIED
TO BE A TRUE COPY
RIC L. BRADSHAW, SHERIFF

EXHIBIT FF

PROBABLE CAUSE AFFIDAVIT

OBTS Number

1. A 2. N.T.A. 3. Request for Warrant 4. Request for Capias — Juvenile

ADMIN

Agency ORI Number: FLO 5 0 0 0 0 0 0

Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE

Agency Report Number: 0 6 - 02 - 094488

Charge Type: Check as many as apply. [X] 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueroa, Anthony

Alias

Race: W Sex: M

CHARGES

Charge Description: Grand Theft 812.014 (2C1)

Charge Description

Charge Description

Charge Description

VICTIM

Victim's Name (Last, First, Middle): Hollywood Video

Race / Sex / Date of Birth: N/A

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone: 13920 Wellington Tr Wellington Fla 33414 (561) 333-0520

Address Source: Vict/Compl

Business Address (Name, Street) (City) (State) (Zip) Phone: Same

Occupation: Same

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody ...

☐ committed the below acts in my presence.

☐ confessed to ______________________ admitting to the below facts.

[X] was observed by Jarrod Angelone who told Det D Smith

that he/she saw the arrested person commit the below acts.

[X] was found to have commited the below acts, resulting from my (described) investigation.

On the ______ day of ______________ 20___ at __________ ☐ A.M. ☐ P.M. (Specifically include facts constituting cause for arrest.)

PROBABLE CAUSE STATEMENT

On 8-15-02 a report was written by Deputy Camargo #2178 ref to a Grand Theft Case that occurred at Hollywood Video located at 13920 Wellington Trace in Wellington Fla. On 8-11-02. The Store Manager Philip Nappule advised that on 8-11-02 it was found that 18 video games had been stolen out of their box and the Boxes left on the shelf. It was found that the suspect had come into the store while it was open to the Public and had cut the side of the game box with a sharp object and took the game out of the box leaving the Box on the shelf. Mr Nappule advised that the event was captured on the Surveillance Camera and he had the video. On 9-2002 [illegible] [illegible] [illegible] and [illegible] of [illegible] [illegible] the video tape for 8-11-02 and it was found that the crime was captured on tape. It showed a w/m wearing long shorts and a long shirt. We observed this person pick up the game off the shelf place the tape under his shirt, then was [illegible] placing the game in his pants →

ADMINISTRATIVE

STATE OF FLORIDA
COUNTY OF PALM BEACH

[signature] 3683

(Signature of Arresting/Investigative Officer)

The foregoing instrument was sworn to and subscribed before me this 12th day of Sept 2002 by Det D Smith Jr

(Print Name of Arresting/Investigative Officer), who is personally known to me and/or produced identification. Type of identification produced: Personally Known

[signature] 6336 [signature] 6147

Notary Public, Clerk of Court, Officer (F.S.S. 117.10)

GM_01202

PAGE ___ OF ___

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PROBABLE CAUSE AFFIDAVIT

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias — Juvenile

ADMIN.

OBTS Number:

Agency ORI Number: FL0 5 0 0 0 0 0

Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE

Agency Report Number: 06-021094488

Charge Type: Check as many as apply. [X] 1. Felony [ ] 2. Traffic Felony [ ] 3. Misdemeanor [ ] 4. Traffic Misdemeanor [ ] 5. Ordinance [ ] 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueroa, Anthony

Alias:

Race: W Sex: M

CHARGES

Charge Description: Grand theft 812.014 (2c1)

Charge Description:

Charge Description:

Charge Description:

VICTIM

Victim's Name (Last, First, Middle): Wal-Mart (Wendy)

Race: S

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone: 12920 Wellington Tr Wellington FL 33414 222-0520

Address Source: Vert/Rempl

Business Address (Name, Street) (City) (State) (Zip) Phone: Same

Occupation:

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody ...

[ ] committed the below acts in my presence.

[ ] confessed to ______ admitting to the below facts.

[X] was observed by Jarred Angelone who told Det D Smith that he/she saw the arrested person commit the below acts.

[X] was found to have commited the below acts, resulting from my (described) investigation.

On the ______ day of ______ 20__ at ______ [ ] A.M. [ ] P.M. (Specifically include facts constituting cause for arrest.)

PROBABLE CAUSE STATEMENT

and place the game back on the shelf. In some captured views the subject is facing the camera and you can see him cutting the game box in place. The store employee Jarred Angelone also viewed the video surveillance tape and he gave a sworn statement. He [illegible] the suspect is known to him member 009625169774 this being Anthony Figueroa who he has known for years. It was also found that Mr Figueroa also did same crimes under case 02-107617 on 8-24-02 where he was also identified. The value of the stolen property in this case is \$900.00. Due to the [illegible] [illegible] the suspect [illegible] [illegible] crime [illegible] [illegible] [illegible] [illegible] [illegible] [illegible] [illegible] [illegible] [illegible] this actions are contrary to F.S. Filed for warrant not in system yet arrested 10-19-02

ADMINISTRATIVE

STATE OF FLORIDA
COUNTY OF PALM BEACH

[signature] 4983

Signature of Arresting/Investigating Officer

Det Daniel Smith 4983 Sworn to (or affirmed) and subscribed before me this 24 day of Sept 2002 by Det D Smith

(Print name of Arresting/Investigating Officer), who is personally known to me and/or produced identification. Type of identification produced: Personally known

[signature] 6336 D/S Juan Var [signature] 6147

Notary Public, Clerk of Court, Officer (F.S.S. 117.10)

GM_01203 PAGE ____ OF ____

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IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

CASE NO. 02CF012205A02
BOOKING NO. 2002343589

vs.

ANTHONY LUIS ZAC FIGUEROA,

02 OCT 29 PM 12:14

FILED

INFORMATION FOR ORIGINAL

GRAND THEFT

In the Name and by Authority of the State of Florida:
BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about August 11, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of $300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.

NOTARY PUBLIC, State of Florida

Ellen Jordan
MY COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIN INSURANCE, INC.

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
THIS 8 DAY OF Aug, 2016
SHARON R. BOCK
CLERK & COMPTROLLER
By ______ DEPUTY CLERK

JER/sw

FCIC REFERENCE NUMBERS:
GRAND THEFT 2399

6

95

IN THE CRIMINAL DIVISION OF THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR PALM BEACH COUNTY

CASE NO. 02 012205CF A02 DIV. W

01/28/2003 11:36:12 20030047647
OR BK 14720 PG 1936
Palm Beach County, Florida
Dorothy H. Wilken, Clerk

OBTS NUMBER ______

STATE OF FLORIDA [ ] COMMUNITY CONTROL VIOLATOR

v.

[ ] PROBATION VIOLATOR

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
THIS 8 DAY OF Aug, 2016
SHARON R. BOCK
CLERK & COMPTROLLER
DEPUTY CLERK

Anthony Luis Zac Figueroa
DEFENDANT

DATE OF BIRTH | RACE: W | GENDER: M | SOCIAL SECURITY NUMBER

FILED
JAN 15 2003
DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS
(CRIM. DIV.)

JUDGMENT

The above Defendant, being personally before this Court represented by S. Lawrence APD (attorney)

[ ] Having been tried and found guilty of the following crime(s):
[X] Having entered a plea of guilty to the following crime(s):
[ ] Having entered a plea of nolo contendere to the following crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
1	Grand theft	812.014(1) and (2)(c)	3°F

[X] and no cause having been shown why the Defendant should not be adjudicated guilty. IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

[ ] ~~and good cause being shown; IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.~~

SENTENCE STAYED [ ] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on [ ] Probation and/or [ ] Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order).

SENTENCE DEFERRED [ ] The Court hereby defers imposition of sentence until ______.

The Defendant in Open Court was advised of his right to appeal from the Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 15 day of January, 2003

CIRCUIT COURT JUDGE

PLEA IN THE CIRCUIT COURT
THE FOLLOWING IS TO REFLECT ALL TERMS OF THE NEGOTIATED SETTLEMENT

Name: Anthony Luis Zac Figueroa
Plea: Guilty X Guilty/Best Interest ___ Nolo Contendere ___

Case No.	Charge	Count	Lesser	Degree
2012206CFA02	Grand Theft	1	—	3F
2012205CFA02	Grand theft	1	—	3F

FILED
JAN 15 2003
DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURT
(CRIM. DIV.)

State to Nolle Prosse the following at sentencing: ___
PSI: Waived/Not Required ✓ Required/Requested ___
ADJUDICATION: Adjudicate [X] ~~Withhold~~ [✓] Court's Discretion [ ]
If the Defendant is convicted of possession, sale, trafficking or conspiracy to possess, sell or traffic in any controlled substance, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license for two (2) years. If the Defendant is convicted of grand theft of a motor vehicle; theft of motor vehicle parts; or, any felony in the commission of which a motor vehicle was used, the Court directs the Department of Motor Vehicles and Highway Safety to revoke the Defendant's driver's license as mandated by law. The Clerk is directed to make the proper notifications.

SENTENCE:
$ ___ Fine $ ___ Court Costs $ ___ Drug Trust Fund
$ ___ Cost of Prosecution $ ___ Public Defender Fees/Costs
Incarceration: ___ Days ___ Months ___ Years
with credit for time served; which is ___ days.

concurrent — Early terminate at 12 months if A Paid
PROBATION: 18 Months / Years - Drug Offender if checked [ ]
ALL CONDITIONS OF PROBATION MUST BE SUCCESSFULLY COMPLETED NO LESS THAN 30 DAYS BEFORE PROBATION IS SCHEDULED TO TERMINATE UNLESS STATED BELOW.
STANDARD CONDITIONS OF PROBATION HAVE BEEN EXPLAINED BY DEFENSE COUNSEL.
SPECIAL CONDITIONS OF PROBATION: (Restitution & completes all conditions)
A) Restitution as per the accompanying order. [✓] (check if ordered) $1900.00
B) Fine: $ ∅ Court Costs: $ 311 Drug Trust Fund: $ 50 ($601.00)
Cost of Prosecution $ 50 Public Defender Fees/Costs $ 190 ($601.00)
C) Substance abuse evaluation and successful completion of recommended treatment [ ] (check if ordered) (enroll within 30 days) If in custody, release only to ___ (1202.00)
D) Random Drug Testing at Defendant's expense [ ] (check if ordered)
E) ___ hours of community service at a rate of no less than ___ hours per month
F) Incarceration: ___ Days ___ Months ___ Year
with credit for time served; which is ___ days. Costs of supervision waived so long as restitution payments current.

OTHER COMMENTS OR CONDITIONS:
D to complete theft abatement course, D to have no contact w/ Hollywood Video in Palm Beach County. If finds & agrees that they are in possession of D's lawful owned property they are to Reload that property Back — Hollywood Video

SENTENCING IS DEFERRED UNTIL ___ IN COURT ROOM ___
THE DEFENDANT UNDERSTANDS IF S/HE FAILS TO APPEAR OR IS ARRESTED ON NEW CHARGES, A CAPIAS WILL BE ISSUED AND THE COURT WILL IMPOSE ANY LAWFUL SENTENCE.

STATE OF FLORIDA - PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
THIS ___ DAY OF ___, 20___
SHARON R. BOCK
CLERK & COMPTROLLER
BY ___ DEPUTY CLERK

[signature]
Assistant State Attorney

[signature]
Attorney for the Defendant

1/15/2003
Date of Plea

X [signature: Anthony Figueroa]
Defendant

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 02012206 CF A02

Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

FILED
Circuit Criminal Department
SHARON R. BOCK
Clerk & Comptroller
Palm Beach County

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:
Probation extended for a period of 6 months with which time defendant will undergo a drug abuse evaluation + commence any recommended treatment

- [X] Defendant admits the Violation of Probation.
- [X] All Original terms and conditions to remain in effect.
- [ ] Defendant is sentenced to ______ days/months Palm Beach County Jail with credit for ______ days.

DONE AND ORDERED this 20 day of May, 2005.

Circuit Judge

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
THIS 8 DAY OF Aug, 2016
SHARON R. BOCK
CLERK & COMPTROLLER
By ______
DEPUTY CLERK

FEB MAY 25 2005

GM_01207

38

OBTS Number

PROBABLE CAUSE AFFIDAVIT

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias — Juvenile

ADMIN. Agency ORI Number: FL0 5 0 0 0 0 0 0 — Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE — Agency Report Number: 06-02-107617

Charge Type: Check as many as apply. [X] 1. Felony [X] 2. Traffic Felony [ ] 3. Misdemeanor [ ] 4. Traffic Misdemeanor [ ] 5. Ordinance [ ] 6. Other ______

Special Notes:

DEF. Name (Last, First, Middle): FIGUEROA, Anthony, L — Alias — Race: W — Sex: M

CHARGES. Charge Description: Grand Theft FSS# 812.014(2C) — Charge Description — Charge Description — Charge Description

VICTIM. Victim's Name (Last, First, Middle): Hollywood Video — Race — Sex: N/A — Date of Birth: N/A

Local Address (Street, Apt. Number) (City) (State) (Zip): 13920 Wellington Trace Wellington — Phone: (561) 333-0520 — Address Source: Vict/Compl

Business Address (Name, Street) (City) (State) (Zip): Same — Phone: ( ) — Occupation: Same

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody ...

[ ] committed the below acts in my presence.

[ ] confessed to ______ admitting to the below facts.

[X] was observed by Jarrod Angeloni who told Det D. Smith #3483 that he/she saw the arrested person commit the below acts.

[X] was found to have commited the below acts, resulting from my (described) investigation.

On the ______ day of ______ 20__ at ______ [ ] A.M. [ ] P.M. (Specifically include facts constituting cause for arrest.)

PROBABLE CAUSE STATEMENT

On 8-24-02 it was reported that a Grand theft had occured at Hollywood Video located at 13920 Wellington Trace in Wellington Fla. The store Manager Philip Nappuli advised that they had found that several video Games had been stolen out of their box and the Box left on the shelf. It was found that the suspect had came into the store while open to the Public and Cut the side of the Game box's with a sharp object and took the game out of the box leaving the Box on the shelf. Mr Nappuli advised that this has occured several times in the last few weeks. It was found however that on 8-24-02 after inventory that 30 video games had been stolen this date valued at $50.00 each and they have all so damaged boxes. Mr Nappuli advised that on one of the cut boxes that the suspect had cut him self while committing the crimes as on one of the box's was covered in blood. Mr Nappuli advised that the crime was captured on the surveillance camera and he had

ADMINISTRATIVE

STATE OF FLORIDA
COUNTY OF PALM BEACH

[signature] 3483

(Signature of Arresting/Investigating Officer)

[signature] 3483

Arresting/Investigating Officer was sworn to, or affirmed and subscribed before me this 30th day of August, 20 02 by Det D. Smith

(Print name of Arresting/Investigating Officer), who is personally known to me and/or produced identification Type of identification produced: Personally Known

[signature] #3745 D/S [signature] 6142

Notary Public, Clerk of Court, Officer (F.S.S. 117.10)

GM_01208

PAGE 1 OF 3

PBSO # 0004 REV. 04/01 DISTRIBUTION: WHITE — Court Copy GREEN — State Attorney YELLOW — Agency PINK — Agency

PROBABLE CAUSE AFFIDAVIT

OBTS Number

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias — Juvenile

ADMIN.
Agency ORI Number: FL0 5 0 0 0 0 0 0
Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE
Agency Report Number: 0 6 - 02 - 107617

Charge Type: Check as many as apply. [X] 1. Felony [ ] 2. Traffic Felony [ ] 3. Misdemeanor [ ] 4. Traffic Misdemeanor [ ] 5. Ordinance [ ] 6. Other

Special Notes:

DEF.
Name (Last, First, Middle): Figueroa, Anthony D. Jr. — Alias — Race: W — Sex: M

CHARGES
Charge Description: Grand Theft FSS 812.014(2)(c)
Charge Description
Charge Description
Charge Description

VICTIM
Victim's Name (Last, First, Middle): Hollywood Video — Race — Sex — Date of Birth
Local Address (Street, Apt. Number) (City) (State) (Zip): 13920 Wellington Trace Well Fla — Phone: 333-0520 — Address Source: Vict/Compl
Business Address (Name, Street) (City) (State) (Zip): Same — Phone — Occupation: Same

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.
The Person taken into custody
[ ] committed the below acts in my presence.
[ ] confessed to ___ admitting to the below facts.
[X] was observed by Tarod Angeloni who told Det. A. Smith
that he/she saw the arrested person commit the below acts.
[X] was found to have commited the below acts, resulting from my (described) investigation.

On the ___ day of ___ 20__ at ___ [ ] A.M. [ ] P.M. (Specifically include facts constituting cause for arrest.)

PROBABLE CAUSE STATEMENT

the video. On 8-30-02 this Detective met with Mr. Apple and two of his Employees. We viewed the video tape and it was found that on the tape the crime was captured and it showed a W/M in long shorts wearing a long shirt picking up the video game boxes and in some cases putting it under his shirt then using force and then placing the tape back on the shelf. In some cases he is facing the camera and you can see him cutting the box and putting the video game in his pants. Store Employee Tarod Angeloni also viewed the video tape and gave a sworn statement that the suspect is known to him store member # 00902516474 [illegible] being Anthony Figueroa who he has known for [illegible] the suspect [illegible] the video game [illegible] and left the store at 18:33 hrs. I obtained also a sworn statement from store manager Mr. Apple advising his store will prosecute. It was later found on 8-30-02 that shortly after I left the store interview that Anthony

ADMINISTRATIVE
STATE OF FLORIDA
COUNTY OF PALM BEACH

Det. A. Smith #3483
(Signature of Arresting/Investigative Officer)

The foregoing instrument was sworn to or affirmed and subscribed before me this 30th day of August 2002, by Det. A. Smith #3483
(Print name of Arresting/Investigative Officer), who is personally known to me and/or produced identification. Type of Identification produced: Personally known

S. Kelly #3745 D/S [signature] 642
Notary Public, Clerk of Court, Officer (F.S.S. 117.10)

GM_01209

PAGE 2 OF 3

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PROBABLE CAUSE AFFIDAVIT

OBTS Number

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias — Juvenile

ADMIN

Agency ORI Number: FL0 5 0 0 0 0 0

Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE

Agency Report Number: 0 6 [illegible]

Charge Type: Check as many as apply. ☒ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueroa, Anthony [illegible] — Alias: * — Race: W — Sex: M

CHARGES

Charge Description: Grand Theft FSS 812.014(2)

Charge Description:

Charge Description:

Charge Description:

VICTIM

Victim's Name (Last, First, Middle): [illegible] — Race — Sex — Date of Birth

Local Address (Street, Apt. Number) (City) (State) (Zip): [illegible] Wellington Fla — Phone: [illegible] 333-052[illegible] — Address Source: Vict/Comp

Business Address (Name, Street) (City) (State) (Zip): Same — Phone — Occupation: Same

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody ...

☐ committed the below acts in my presence.
☐ confessed to ____________ admitting to the below facts.
☒ was observed by [illegible] who told Det. D. Smith [illegible] that he/she saw the arrested person commit the below acts.
☒ was found to have commited the below acts, resulting from my (described) investigation.

On the ______ day of ______ 20__ at ______ ☐ A.M. ☐ P.M. (Specifically include facts constituting cause for arrest.)

PROBABLE CAUSE STATEMENT

Figueroa came into the store with his hand bandaged this due to the possible cut received while committing the crime as bloodiness [illegible] on one of the video tapes. Mr Figueroa however left the store before police could arrive.

Due to my findings as stated herein and with positive ID [illegible] of the suspect I find there is Probable Cause for the arrest of Mr Figueroa for the crime of Grand theft as his actions are contrary to FSS.

The stolen property is valued at approx [illegible] dollars.

STATE OF FLORIDA — PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.
THIS 8 DAY OF [illegible] 2016
SHARON R. BOCK
CLERK & COMPTROLLER
By [signature]
DEPUTY CLERK

ADMINISTRATIVE

STATE OF FLORIDA
COUNTY OF PALM BEACH

[signature] #3483

(Signature of Arresting/Investigating Officer)

[illegible]

The foregoing instrument was sworn to or affirmed and subscribed before me this 30th August 2003 by Det D. Smith Jr

(Print name of Arresting/Investigating Officer), who is personally known to me and/or produced identification. Type of identification produced: Personally known

Sgt Stephen [illegible] #3745 D/S [illegible] 6147

Notary Public, Clerk of Court, Officer (F.S.S. 117.10)

GM_01210

PAGE 3 OF 3

PBSO # 0004 REV. 04/01 — DISTRIBUTION: WHITE — Court Copy GREEN — State Attorney YELLOW — Agency PINK — Agency

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, STATE OF FLORIDA
CRIMINAL DIVISION "W" (CGS)

STATE OF FLORIDA

CASE NO. 02CF012206A02
BOOKING NO. 2002343590

vs.

ANTHONY LUIS ZAC FIGUEROA,
W/M, [redacted]

ORIGINAL

FILED 02 OCT 29 PM 12:14

INFORMATION FOR:

GRAND THEFT

In the Name and by Authority of the State of Florida:
BARRY E. KRISCHER, State Attorney for the Fifteenth Judicial Circuit, Palm Beach County, Florida, by and through his undersigned Assistant State Attorney, charges that ANTHONY LUIS ZAC FIGUEROA on or about October 24, 2002, in the County of Palm Beach and State of Florida, did knowingly obtain or use, or endeavor to obtain or use video games of a value of $300.00 or more, which was the property of HOLLYWOOD VIDEO, or any other person not the defendant(s), with the intent to permanently or temporarily deprive HOLLYWOOD VIDEO or any other person not the defendant(s) of the property or benefit therefrom or to appropriate the property to the use of ANTHONY LUIS ZAC FIGUEROA or to the use of any person not entitled thereto, contrary to Florida Statute 812.014(1) and (2)(c). (3 DEG FEL)

[signature]
JILL ESTEY RICHSTONE
FL. BAR NO. 0928933
Assistant State Attorney

STATE OF FLORIDA
COUNTY OF PALM BEACH

Appeared before me, JILL ESTEY RICHSTONE Assistant State Attorney for Palm Beach County, Florida, personally known to me, who, being first duly sworn, says that the allegations as set forth in the foregoing information are based upon facts that have been sworn to as true, and which, if true, would constitute the offense therein charged, that this prosecution is instituted in good faith, and certifies that testimony under oath has been received from the material witness or witnesses for the offense.

[signature]
Assistant State Attorney

Sworn to and subscribed to before me this 29 day of October, 2002.

[signature]
NOTARY PUBLIC, State of Florida

Ellen Jordan
MY COMMISSION # CC799741 EXPIRES
December 28, 2002
BONDED THRU TROY FAIN INSURANCE, INC

JER/sw

FCIC REFERENCE NUMBERS:
GRAND THEFT 2[illegible]

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
THIS 8 DAY OF [illegible] 20[illegible]
SHARON R. BOCK
CLERK & COMPTROLLER
By [signature]
DEPUTY CLERK

95

IN THE CRIMINAL DIVISION OF THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT OF FLORIDA, IN AND FOR PALM BEACH COUNTY

CASE NO. 020122206CF A02 DIV. W

OBTS NUMBER

01/28/2003 11:36:12 20030047648
OR BK 14720 PG 1937
Palm Beach County, Florida
Dorothy H. Wilken, Clerk

STATE OF FLORIDA

[ ] COMMUNITY CONTROL VIOLATOR

v.

[ ] PROBATION VIOLATOR

Anthony Luis Zac Figueroa
DEFENDANT

[redacted]

W — RACE

M — GENDER

[redacted] SOCIAL SECURITY NUMBER

FILED
JAN 15 2003
DOROTHY H. WILKEN, CLERK
CIRCUIT & COUNTY COURTS

JUDGMENT

The above Defendant, being personally before this Court represented by S. Lawrence APD (attorney)

[ ] Having been tried and found guilty of the following crime(s):	[X] Having entered a plea of guilty to the following crime(s):	[ ] Having entered a plea of nolo contendere to the following crime(s):

COUNT	CRIME	OFFENSE STATUTE NUMBER(S)	DEGREE
1	Grand theft	812.014(1) and (2)(c)	3F

[X] and no cause having been shown why the Defendant should not be adjudicated guilty, IT IS ORDERED THAT the Defendant is hereby ADJUDICATED GUILTY of the above crime(s).

[ ] and having been convicted or found guilty of, or having entered a plea of nolo contendere or guilty, regardless of adjudication, to attempts or offenses relating to sexual battery (ch. 794), lewd and lascivious conduct (ch. 800), or murder (s. 782.04), aggravated battery (s. 784.045), burglary (s. 810.02), carjacking (s. 812.133), or home invasion robbery (s. 812.135), or any other offense specified in section 943.325, the defendant shall be required to submit blood specimens.

[X] ~~and good cause being shown: IT IS ORDERED THAT ADJUDICATION OF GUILT BE WITHHELD.~~

SENTENCE STAYED [ ] The Court hereby stays and withholds imposition of sentence as to count(s) and places the Defendant on [ ] Probation and/or [ ] Community Control under the supervision of the Dept. of Corrections (conditions of probation set forth in separate order).

SENTENCE DEFERRED [ ] The Court hereby defers imposition of sentence until

The Defendant in Open Court was advised of his right to appeal from this Judgment by filing notice of appeal with the Clerk of Court within thirty days following the date sentence is imposed or probation is ordered pursuant to this adjudication. The defendant was also advised of his right to the assistance of counsel in taking said appeal at the expense of the State upon showing of indigency.

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
DOROTHY H. WILKEN, CLERK
By DEPUTY CLERK

DONE AND ORDERED in Open Court at Palm Beach County, Florida, this 15 day of January, 2003

CIRCUIT COURT JUDGE

HOY
"W"

DC# W14116
Officer: 15-3

JUDGMENT OF GUILT AND PLACING DEFENDANT ON PROBATION

STATE OF FLORIDA
-vs- Plaintiff
ANTHONY LUIS ZACFIGUEROA
Defendant

In The Circuit Court
of Palm Beach County, Florida
Case No. 02-12206CFA02

This cause coming on this day to be heard before me, and you, the defendant ANTHONY LUIS ZACFIGUEROA, being now present before me, and you having:
PLED GUILTY TO

The offense of COUNT 1. GRAND THEFT the court hereby adjudges you to be guilty of said offense; and

It appearing to the satisfaction of the Court that you are not likely again to engage in a criminal course of conduct, and that the ends of justice and the welfare of society do not require that you should suffer the penalty authorized by law:

Now, therefore, it is ordered and adjudged that the imposition of sentence are hereby withheld, and that you are hereby placed on probation for a period of EIGHTEEN (18) MONTHS CONCURRENT WITH 02-12205CFA02 under the supervision of the Department of Corrections and its Officers, such supervision to be subject to the provisions of the laws of this State.

It is further order that you shall comply with the following conditions of probation:

(1) Not later than the fifth day of each month or as directed, you will make a full and truthful report to your Probation Officer on the form provided for that purpose.
(2) You will pay to the State of Florida the amount of $ **50.00 FIFTY DOLLARS** per month, plus a 4% surcharge, toward the cost of your supervision, unless otherwise exempted in compliance with Florida Statutes.
(3) You will not change your residence or employment or leave the county of your residence without first procuring the consent of your Probation Officer.
(4) You will neither possess, carry or own any weapons or firearm without first securing the consent of your Probation Officer.

AMG

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ZacFigueroa, Anthony
Case # 02-12206CFA02

(5) You will live and remain at liberty without violating any law. A conviction in a court of law shall not be necessary in order for such a violation to constitute a violation of your probation.

(6) You will submit to Urinalysis, Breathalyzer or Blood tests, as directed by your Probation Officer or the Professional Staff of any treatment center where you may be receiving treatment, to determine the possible use of alcohol, drugs or controlled substances.

(7) You will make a good faith effort to obtain lawful employment and support any dependents to the best of your ability as directed by your Probation Officer.

(8) You will promptly and truthfully answer all inquiries directed to you by the Court or the Probation Officer, and allow the Officer to visit in your home, at your employment site, or elsewhere, and you will comply with all instructions he may give you.

(9) RESTITUTION TO: HOLLYWOOD VIDEO IN THE AMOUNT OF $1000.00 MINIMUM PAYMENT OF $55.56 PER MONTH – CRO FILED

(10) NO CONTACT WITH HOLLY VIDEO IN PALM BEACH CO.

(11) ENTER AND COMPLETE: THEFT ABATEMENT PROGRAM

(12) AUTOMATIC EARLY TERMINATION AFTER 12 MONTHS PROVIDED ALL CONDITIONS ARE SATISFIED

You are hereby placed on notice that the Court may at any time rescind or modify any of the conditions of your probation, or may extend the period of probation as authorized by law, or may discharge you from further supervision; and that if you violate any of the conditions of your probation, you may be arrested and the Court may revoke your probation and impose any sentence which it might have imposed before placing you on probation.

It is further ordered that when you have reported to the Probation Officer and have been instructed as to the conditions of probation you shall be released from custody if you are in custody and if you are at liberty on bond, the sureties thereon shall stand discharged from liability.

ZacFigueroa, Anthony
Case # 02-12206CFA02

It is further ordered that the Clerk of this Court file this order in his office, record the same in the Minutes of the Court, and forthwith provide certified copies of same to the Probation Officer for his use in compliance with the requirements of law.

DONE AND ORDERED IN OPEN COURT THIS 15TH DAY OF JANUARY, 2003.

Signed this 22 day of January, 2003. [signature]
JUDGE

I acknowledge receipt of a certified copy of this order and that the conditions have been explained to me.

Date: ________________ Probationer ________________________

Instructed by: ________________________

Original: Court
Copies: Probationer/File

DC4-900A

JF 1/16/03

In the Circuit Court of the Fifteenth Judicial Circuit
In and For Palm Beach County, Florida

Case No. 0201220SCF A02 [redacted]

Division: W

STATE OF FLORIDA

VS.

Anthony Luis Zac Figueroa
Defendant

ORDER MODIFYING PROBATION

THIS cause has come before the Court on the Defendant's Violation of Probation. Upon consideration, it is hereby:

ORDERED AND ADJUDGED that the Defendant's Probation is modified as follows:
Probation extended for a period of 6 months with which time defendant will undergo a drug abuse evaluation + commence any recommended treatment

☒ Defendant admits the Violation of Probation.

☒ All Original terms and conditions to remain in effect.

☐ Defendant is sentenced to ________ days/months Palm Beach County Jail with credit for ________ days.

DONE AND ORDERED this 20 day of May, 2005.

[signature]
Circuit Judge

EB 33

31684 3334

ARREST / NOTICE TO APPEAR
Juvenile Referral Report

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias — 1

Juvenile /

ADMINISTRATIVE

OBTS Number

Agency ORI Number: FL0, 5, 0, 0, 0, 0, 0

Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE

Agency Report Number: 0 6 - 0 2 - 1 2 8 8 2 1

Charge Type: Check as many as apply. ☒ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

If Weapon Seized — Enter Type: NONE

Multiple Clearance Indicator

Location of Arrest (Including Name of Business): 13920 Wellington Trace Hollywood Video

Location of Offense (Business Name, Address): same

Date of arrest: 01 09 02 | Time of Arrest: 1800 | Booking Date: 10.19 | Booking Time | Jail Date | Jail Time | Location of Vehicle

DEFENDANT

Name (Last, First, Middle): Figueroa, Anthony, Luis, Zac

Alias (Name, DOB, Soc. Sec. #, Etc.)

Race: W - White, B - Black, I - American Indian, O - Oriental/Asian: W | Sex: M | Height: 5'9 | Weight: 145 | Eye Color: Brn | Hair Color: Brn | Complexion: Med | Build: Slim

Scars, Marks, Tatoos, Unique Physical Features: Scar on Left Arm

Marital Status: Single | Religion: Christian

Indication of: Alcohol Influence Y ☐ N ☒ Unk. ☐; Drug Influence Y ☐ N ☒ Unk. ☐

Local Address (Street, Apt. Number): [redacted]

Residence Type: 1. City 2. County 3. Florida 4. Out of State: 2

Permanent Address: SAME | Phone ( )

Address Source: FL DL

Business Address (Name, Street) / | (City) | (State) | (Zip) | Phone ( ) Y

Occupation /

D/L Number, State: [redacted] | Soc. Sec. Number: [redacted] | INS Number

Place of Birth (City, State): Plantation, FL | Citizenship: USA

CO-DEF.

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

Co-Defendant Name (Last, First, Middle) | Race | Sex | Date of Birth | ☐ 1. Arrested ☐ 2. At Large | ☐ 3. Felony ☐ 4. Misdemeanor ☐ 5. Juvenile

JUVENILE

☐ Parent ☐ Legal Custodian ☐ Other: Name (Last) (First) (Middle) | Residence Phone ( )

Address (Street, Apt. Number) (City) (State) (Zip) | Business Phone ( )

Notified by: (Name) | Date | Time | Juvenile Disposition: 1. Handled/Processed within Dept. and Released. 2. TOT HRS/DYS 3. Incarcerated

Released To: (Name) | Relationship | Date | Time

① 3,000 ② P/L

The above address was provided by ☐ defendant and / or ☐ defendant's parents. The child and / or parent was told to keep the Juvenile Court Clerk's Office (Phone 355-2528) informed of any change of address. ☐ Yes, by: (Name) ☐ No: (Reason)

School Attended | Grade

Property Crime? ☐ Yes ☐ No | Description of Property | Value of Property

CODE

Drug Activity: N. N/A, P. Possess, S. Sell, B. Buy, T. Traffic, R. Smuggle, D. Deliver, E. Use, K. Dispense/Distribute, M. Manufacture/Produce/Cultivate, Z. Other

Drug Type: N. N/A, A. Amphetamine, B. Barbiturate, C. Cocaine, E. Heroin, H. Hallucinogen, M. Marijuana, O. Opium/Deriv., P. Paraphernalia/Equipment, S. Synthetic, U. Unknown, Z. Other

CHARGE

Charge Description: Grand Theft | Counts | Domestic Violence ☐Y ☒N | Statute Violation Number: 812.014 (2)(C)(1) | Violation of ORD #

Drug Activity: N | Drug Type: N | Amount / Unit | Offense #: 02-128821 | Warrant / Capias Number | Bond

CHARGE

Charge Description: F.T.A. | Counts: 1 | Domestic Violence ☐Y ☒N | Statute Violation Number: 843.15 | Violation of ORD #

Drug Activity: N | Drug Type: N | Amount / Unit | Offense #: 02/128821 | Warrant / Capias Number: 02 021953 TC | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐Y ☐N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

CHARGE

Charge Description | Counts | Domestic Violence ☐Y ☐N | Statute Violation Number | Violation of ORD #

Drug Activity | Drug Type | Amount / Unit | Offense # | Warrant / Capias Number | Bond

NOTICE TO APPEAR

Location (Court, Room Number, Address)

Court Date and Time

Month | Day | Year | Time | A.M. | P.M.

I AGREE TO APPEAR AT THE TIME AND PLACE DESIGNATED TO ANSWER THE OFFENSE CHARGED OR TO PAY THE FINE SUBSCRIBED. I UNDERSTAND THAT SHOULD I WILLFULLY FAIL TO APPEAR BEFORE THE COURT AS REQUIRED BY THIS NOTICE TO APPEAR, THAT I MAY BE HELD IN CONTEMPT OF COURT AND A WARRANT FOR MY ARREST SHALL BE ISSUED.

Signature of Defendant (or Juvenile and Parent/ Custodian) | Date Signed

ADMIN.

HOLD for other Agency Name:

☐ Dangerous ☐ Resisted Arrest ☐ Suicidal ☐ Other:

Signature of Arresting Officer: x D/S [signature]

Name of Arresting Officer (Print): VAN DUSEN | I.D. #: 6142

Name Verification (Printed by Arrestee) (PRINT)

Intake Deputy: [signature] 6921 | I.D. # | Pouch #: 3334

Transporting Officer: SAME | I.D. # | Agency: PBSO

Witness here if subject signed with an "X"

CAA

GM_01217

OF 2

PBSO #148 REV. 8/97 DISTRIBUTION: WHITE - COURT COPY GREEN - STATE ATTORNEY YELLOW - AGENCY PINK - AGENCY GOLD - DEFENDANT (N.T.A.'s ONLY)

PROBABLE CAUSE AFFIDAVIT

OBTS Number

1. Arrest 2. N.T.A. 3. Request for Warrant 4. Request for Capias — 1 — Juvenile

ADMIN.

Agency ORI Number: FL0 5 0 0 0 0 0 0

Agency Name: PALM BEACH COUNTY SHERIFF'S OFFICE

Agency Report Number: 06-10-21-12882-1

Charge Type: Check as many as apply ☒ 1. Felony ☐ 2. Traffic Felony ☐ 3. Misdemeanor ☐ 4. Traffic Misdemeanor ☐ 5. Ordinance ☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueroa, Anthony — Alias — Race: W — Sex: M

CHARGES

Charge Description: Grand Theft

Charge Description:

Charge Description:

Charge Description:

VICTIM

Victim's Name (Last, First, Middle): Hollywood Video — Race: / — Sex: / — Date of Birth

Local Address (Street, Apt. Number) (City) (State) (Zip) Phone ( ) — Address Source

Business Address (Name, Street): 13920 Wellington Trace (City) Wellington (State) FL (Zip) 33414 Phone (561) — Occupation

PROBABLE CAUSE STATEMENT

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.

The Person taken into custody ...

☒ committed the below acts in my presence.

☐ confessed to ______ admitting to the below facts.

☒ was observed by Philip Napuli who told D/S Van Dusen that he/she saw the arrested person commit the below acts.

☒ was found to have commited the below acts, resulting from my (described) investigation.

On the 19 day of October 2002 at 600 ☐ A.M. ☒ P.M. (Specifically include facts constituting cause for arrest.)

I responded to Hollywood Video located at 13920 Wellington Trace in Palm Beach County in response to a shoplifting call. PBSO dispatch was advised by Store Manager Philip Napuli that two white males were stuffing the pockets of their shorts with video games. These w/m later identified as Anthony Figueroa and [redacted] were caught on video survelliance which has been entered into PBSO evidence. These 2 subjects were apprehended by myself and D/S Conley leaving the store. The subjects had 7 video games in the pockets of their shorts. (3 playstation 2, 3 X Box and 1 Gamecube). These games totaled $350.00. Also these 2 subjects were identified by Napuli as they were leaving the store. It should be noted that Anthony Figueroa was apprehended attempting to enter his vehicle. He did have the driver side door open and was getting in. Upon search of his vehicle which was taken for forfeiture 6 other video games were found without receipts. These were placed into evidence. Store manager told me that [redacted] came to the counter and asked a clerk questions in an attempt to distract him while Figueroa left the store. [redacted] then also left. Neither subject made any attempt to pay for the games. Based upon the above described investigation I believe PC exists for arrest.

ADMINISTRATIVE

STATE OF FLORIDA
COUNTY OF PALM BEACH

[signature]
(Signature of Arresting/Investigative Officer)

The foregoing instrument was sworn to or affirmed and subscribed before me this ______ Van Dusen

(Print name of Arresting/Investigative Officer), who is personally known to me and/or produced identification. Type of identification produced

[signature] 3483

Notary Public, Clerk of Court, Officer (F.S.S. 117.10)

GM_01218

PAGE 1 OF 2

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CRIMINAL DIVISION

DS JASON VANDUSEN, 6142
PALM BEACH COUNTY SHERIFFS OFFICE
Agency case number 02-128821

CASE NO. 02CF012204A99
Booking No. 2002343586

STATE OF FLORIDA

vs.

ANTHONY LUIS ZAC FIGUEROA, W/M, [redacted]
_______________________________/

NO FILE FOR:

GRAND THEFT

The State enters a no-file because the elements of the crime cannot be proven beyond a reasonable doubt.

BARRY E. KRISCHER, STATE ATTORNEY

DATE: October 28, 2002

By: J. Richstone
JILL ESTEY RICHSTONE
Assistant State Attorney
FL. BAR NO. 0928933

JER/sw

CLERK AND SHERIFF TO RESCIND NO CONTACT ORDER

PROBABLE CAUSE AFFIDAVIT

OBTS Number | 1. / 2. | 3. Request for Warrant | 4. Request for Capias | 1 | Juvenile

ADMIN.

Agency ORI Number: FLO 5 0 2 8 0 0 | Agency Name: ROYAL PALM BEACH POLICE DEPARTMENT | Agency Report Number: 86-003812

Charge Type: Check as many as apply.
- ☒ 1. Felony
- ☐ 2. Traffic Felony
- ☐ 3. Misdemeanor
- ☐ 4. Traffic Misdemeanor
- ☐ 5. Ordinance
- ☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueróa, Anthony Luis Zac | Alias | Race: W | Sex: M

CHARGES

Charge Description: Grand Theft Auto | Charge Description:
Charge Description: | Charge Description:

VICTIM

Victim's Name (Last, First, Middle): Figueroa, Richard Jr. | Race: W | Sex: M

(zip) | Phone | Address

Business Address (Name, Street) | (City) | (State) | (zip) | Phone | Occupation

PROBABLE CAUSE STATEMENT

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law. The Person taken into custody ...

☒ committed the below acts in my presence.
☐ confessed to ______ admitting to the below facts.
☐ was observed by ______ who told ______ that he/she saw the arrested person commit the below acts.
☒ was found to have committed the below acts, resulting from my (described) investigation.

On the 22nd day of October 20 00 at 12:27 ☒ A.M. ☐ P.M. (Specifically include facts constituting cause for arrest.)

I met with victim Richard Figueroa, Jr., who told me that he allowed his brother, Anthony, to use his 1986 Mazda pick-up truck to drive a friend home to Okeechobee Blvd. and Cherry Road at about 8pm, on 10/21/00. Richard told me that he has always been very specific about the times and use he allows his brother to use the truck, to the extent that he has told Anthony that if the truck were not brought back in the allotted time, he would call the police and report the truck stolen. For this trip, Anthony told Richard he would be back in 30 minutes. At about 10:15pm, Anthony called Richard to say that the truck had a flat tire, and that he would be right home. Richard asked Anthony where he was and Anthony would not say. At about 12:22am, on 10/22/00, Richard called the police department to report the truck stolen.

I explained the seriousness about reporting a vehicle stolen, to the extent that is covered on the stolen vehicle affidavit. Richard filled-out this form and signed the same without any hesitation. Richard further stated that he had to be at work in the morning and was concerned since he needed the vehicle to get there.

At about 01:55am, Officer T.E. Murphy located and stopped this vehicle, near Huntington Woods and Royal Palm Beach Boulevard. Driving was a [redacted] nd Anthony was in the passenger's seat. I responded to this location where the two were still inside the vehicle. Both subjects were placed under arrest for Grand Theft Auto. Anthony Figueroa, since he first had possession of the vehicle, depriving the victim of the same, and Luckett, for being in actual physical control of the vehicle, also depriving the victim use of his vehicle.

When the victim arrived to reclaim his vehicle, he inspected the tires and believed that they were the original tires and could not detect any evidence of a flat tire or use of a spare tire. He further wrote me another written statement, indicating to me that Luckett never had permission to drive his truck.

Figueroa went to the County Jail and [redacted] went to the Juvenile Assessment Center.

FILED 00 OCT 23 AM 6:52
DOROTHY H. WILKEN, CLERK CIR. CT. PB. CO. FL. CRIM. DIV.

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any as required by law.
THIS 8 DAY OF Aug 20 16
SHARON R. BOCK
CLERK & COMPTROLLER
By [signature]
DEPUTY CLERK

ADMINISTRATIVE

SWORN AND SUBSCRIBED BEFORE ME
[signature] Sgt. ... #74
NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER
10-22-00
DATE

[signature]
SIGNATURE OF ARRESTING / INVESTIGATING OFFICER
Eli Shaivitz #70
NAME OF OFFICER (PLEASE PRINT)
10-22-00
DATE

PAGE 1 OF 1

DISTRIBUTION: WHITE -- Court Copy | GREEN -- State Attorney | YELLOW-- Agency | PINK -- Agency | GOLDENROD --

PROBABLE CAUSE AFFIDAVIT

OBTS Number

3. Request for Warrant
4. Request for Capias

1

Juvenile

ADMIN.

Agency ORI Number: FLO 5 0 2 8 0 0

Agency Name: ROYAL PALM BEACH POLICE DEPARTMENT

Agency Report Number: 8 6 - 0 0 3 8 1 2

Charge Type: Check as many as apply.
- ☒ 1. Felony
- ☐ 2. Traffic Felony
- ☐ 3. Misdemeanor
- ☐ 4. Traffic Misdemeanor
- ☐ 5. Ordinance
- ☐ 6. Other

Special Notes:

DEF.

Name (Last, First, Middle): Figueroa, Anthony Luis Zac

Alias

Race: W

Sex: M

CHARGES

Charge Description: Grand Theft (Auto)

Charge Description:

Charge Description:

Charge Description:

Victim's Name (Last, First, Middle): Figueroa, Richard Jr

Race: W

Sex: M

(zip) Phone Address verbal

(zip) Phone Occupation

PROBABLE CAUSE STATEMENT

The undersigned certifies and swears that he/she has just and reasonable grounds to believe, and does believe that the above named Defendant committed the following violation of law.
The Person taken into custody ...

- ☒ committed the below acts in my presence.
- ☐ confessed to ______ admitting to the below facts.
- ☐ was observed by ______ who told ______ that he/she saw the arrested person commit the below acts.
- ☒ was found to have committed the below acts, resulting from my (described) investigation.

On the 22nd day of October 20 00 at 1:55 ☒ A.M. ☐ P.M. (Specifically include facts constituting cause for arrest.)

ADDITIONAL PROBABLE CAUSE:

At above date and time, I was southbound in the 1300 block of Royal Palm Beach Blvd. when I observed a white and maroon Mazda pickup truck driving north on Royal Palm Beach Blvd. Ofc. Eli Shaivitz had earlier taken a stolen vehicle report on a truck which matched this description. I caught up to the truck and saw that it had Florida tag number D61XWE. This was the tag number of the stolen truck. I stopped the truck in the 100 block of Sherwood Dr. I found [redacted] W/M [redacted] to be the driver and Anthony Luis Zac Figueroa W/M [redacted] to be the passenger. Anthony Figueroa is the brother of the owner and was the original suspect in the stolen car case. Both subjects were taken into custody, secured, and placed in my patrol unit. I transported the to the police station where they were turned over to Ofc. Eli Shaivitz.

STATE OF FLORIDA - PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.
THIS 8 DAY OF Aug 20 16
SHARON R. BOCK
CLERK & COMPTROLLER
By [signature]
DEPUTY CLERK

ADMINISTRATIVE

SWORN AND SUBSCRIBED BEFORE ME

[signature] #70

NOTARY PUBLIC / CLERK OF COURT / POLICE OFFICER

10-22-00

DATE

[signature]

SIGNATURE OF ARRESTING / INVESTIGATING OFFICER

T. E. Murphy #100

NAME OF OFFICER (PLEASE PRINT)

10-22-00

DATE

PAGE ___ OF ___

DISTRIBUTION: WHITE -- Court Copy GREEN -- State Attorney YELLOW-- Agency PINK -- Agency GOLDENROD --

JB

Case No.: 00-11425CF A02 "T" ST of FL vs. ANTHONY LUIS ZAC FIGUEROA

Charges: GRAND THEFT (MOTOR VEHICLE)

Arrest# 2000346620 Bond# P07-00274775 Type SB-PN $ 3,000 A/C

Date 12-7-00 Judge Lindsey Crt. Rep.

ASA DC

Deft--Pres / Not Pres. Def. Co. Int Esq / PD---Pres / Not Pres.

Before the Court for: case disposition

❑ Granted ❑ Denied ❑ With / Without Prejudice ❑ Withdrawn ❑ Court Reserves Ruling ❑ Written Order to Follow

❑ Warrant ❑ Ordered ❑ Recalled ❑ Bond Set at $ ❑ See Below ❑ Also Covers ❑ Sp Cond

❑ Bond Forf ❑ OR: Disch / Revoked / Reinstated ☒ Bond: Disch / Revoked / Reinstated ❑ SOR: Disch / Revoked / Reinstated

❑ Bond Forf Vacated ❑ Previous Bond Reinstated, if Bondsman agrees ❑ State failed to file charges ❑ Released O.R.

❑ Deft ___ Indigent ❑ PD Appt ❑ Hrg only PD Pres ❑ Court Appts

Evaluation for: ❑ Drug Farm ❑ DOC Non-Secure Bed by

❑ Pre-Plea ❑ PSI ordered by/within ___ days ❑ w/input from DJJ / Staffing

DEFT ENTERED A PLEA OF: ❑ NOT GUILTY ❑ GUILTY ❑ NO CONTEST ❑ BEST INTEREST ❑ TO THE COURT

As Charged-Cts Lesser Cts Lesser Charge

❑ Sw & Test ❑ Adv of Rts ❑ Waived PSI Lesser Cts Lesser Charge

❑ ADJ GUILTY as Charged as to Cts Lesser Cts

❑ FOUND GUILTY as Charged as to Cts Lesser Cts

❑ ADJ W/HELD as to Cts ❑ SENT W/HELD as to Cts

❑ FOUND AND ADJUDICATED DELINQUENT as to Cts ❑ Dispo Order to follow / Filed

❑ FOUND & ADJ NOT GUILTY as to Cts ❑ Dismiss ☒ Nolle Prosse Cts 1

Prob / Comm Control: ❑ Revoked ❑ Reinstated ❑ Modified ❑ Term. Successfully / Unsuccessfully

❑ SEE ORDER ASSESSING COSTS ❑ **SEE REVERSE SIDE FOR INSTRUCTIONS REGARDING FURTHER HEARING**

❑ Stip/Found: (violent) Habitual Off. 775.084 ❑ Stip/Found: Sexual Offender / Sexual Predator ❑ Stip/Found: P.R.R.

SENTENCE: PBCJ: Cts: / DOC: Cts:

PBCJ: Cts: / DOC: Cts:

❑ W/Credit for ___ Days / Mos. / Yrs. ❑ Deft Remanded ❑ Deft to remain on same rel. status pending sent.

Conc / Consec / Co-Term w/cases / cts:

❑ Execution of Sentence Stayed ❑ Sentence Suspended ❑ Time served as to Cts

❑ Youthful Off ❑ Habitual Off ❑ Min / Mand: ___ as to Cts

❑ ABOVE SENTENCE TO BE FOLLOWED By: ❑ Probation ❑ Drug Off Prob ❑ Comm. Control ❑ I ❑ II - See Page 2

STATE OF FLORIDA • PALM BEACH COUNTY
I hereby certify that the foregoing is a true copy of the record in my office with redactions, if any, as required by law.
THIS 8 DAY OF July 2016
SHARON R. BOCK
CLERK & COMPTROLLER
By ___ DEPUTY CLERK

___ Set / Remains Set / Reset Dv ___ Rm ___ at ___ AM/PM

___ Set / Remains Set / Reset Rm ___ at ___ AM/PM

❑ Deft sign

❑ Def Co ❑ ASA ❑ Bondsman

❑ Prob ❑ Jail ❑ DJJ ❑ GAL Notified by mail by: ___ on ___ / ___ / ___

❑ County Courthouse 205 N. Dixie, West Palm Beach ❑ Courtroom, Criminal Justice Bldg. 38844 State Road 80, Belle Glade ❑ Courtroom, Criminal Justice Complex 3228 Gun Club Rd., West Palm Beach

IF YOU ARE A PERSON WITH A DISABILITY WHO NEEDS ANY ACCOMMODATION IN ORDER TO PARTICIPATE IN THIS PROCEEDING, YOU ARE ENTITLED, AT NO COST TO YOU, TO THE PROVISION OF CERTAIN ASSISTANCE. PLEASE CONTACT THE ADMINISTRATIVE OFFICE OF THE COURT - 205 NORTH DIXIE HIGHWAY, ROOM 5.2500, WEST PALM BEACH, FL 33401-TELEPHONE (561) 355-2431, WITHIN 2 WORKING DAYS OR YOUR RECEIPT OF THIS NOTICE. IF YOU ARE HEARING IMPAIRED, CALL 1-800-955-8771; IF VOICE IMPAIRED, 1-800-955-8770

Form 611

EXHIBIT GG

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

---x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

June 21, 2016
9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

2 A P P E A R A N C E S:
3
4 BOIES SCHILLER & FLEXNER, LLP
5 Attorneys for Plaintiff
401 East Las Olas Boulevard
6 Fort Lauderdale, Florida 33301
BY: BRADLEY EDWARDS, ESQ.
7
8 HADDON MORGAN & FOREMAN, P.C.
Attorneys for Defendant
9 150 East 10th Avenue
Denver, Colorado 80203
10 BY: JEFFREY PAGLIUCA, ESQ.
11
12 JONES FOSTER JOHNSTON & STUBBS, P.A.
Attorneys for Deponent
13 505 South Flagler Drive
Suite 1100
14 West Palm Beach, Florida 33401
BY: JOANNE O'CONNOR, ESQ.
15
16 ALSO PRESENT: Sandy Perkins, Paralegal
Boies Schiller & Flexner
17
Ryan Kick, Videographer
18
19
20
21
22
23
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25

2
3 I N D E X

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8 E X H I B I T S

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11
12
13 *** Exhibit 11 was used on two different exhibits.
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1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. Most of the events that we are going to
3 discuss today occurred, at least the investigation
4 that we're going to discuss today, occurred in 2005
5 and 2006.
6 So can you just tell us what your position
7 was with the Palm Beach Police Department at that
8 time?
9 A. I was a police detective.
10 Q. And did you investigate a person by the
11 name of Jeffrey Epstein?
12 A. I did.
13 Q. All right.
14 What was your role in the investigation of
15 Jeffrey Epstein?
16 A. I was the lead detective once the case was
17 turned over to me by Michelle Pagan.
18 Q. Okay. And as the lead detective, did you
19 review all of the history of the investigation up to
20 the point it was turned over to you?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Correct.
24 BY MR. EDWARDS:
25 Q. And was that one of your jobs as the lead

1 JOSEPH RECAREY - CONFIDENTIAL
2 investigator over a case, is to acclimate yourself
3 to the history of the case?
4 MR. PAGLIUCA: Object to form and
5 foundation.
6 THE WITNESS: Yes.
7 BY MR. EDWARDS:
8 Q. Just so that the record is clear, will you
9 just give a brief pause in case Mr. Pagliuca has an
10 objection?
11 A. All right.
12 Q. So they can also capture your answer.
13 A. Okay.
14 Q. In reviewing the history of the case, did
15 you review prior police reports, police reports
16 prior to you becoming involved personally?
17 A. I did.
18 Q. Okay. And I've handed you what is marked
19 as Plaintiff's Exhibit 1.
20 (The referred-to document was marked by
21 the court reporter for Identification as
22 Deposition Exhibit 1.)
23 BY MR. EDWARDS:
24 Q. Do you recognize that?
25 A. Yes.

1 JOSEPH RECAREY - CONFIDENTIAL
2 Police Department incident report as suspects?
3 MS. SCHULTZ: Object to form and
4 foundation.
5 BY MR. PAGLIUCA:
6 Q. These people, right?
7 A. At that time, yes.
8 Q. Well, and then are you aware -- were there
9 any suspects added in any subsequent reports, to
10 your knowledge?
11 A. Not that I'm aware of.
12 Q. In fact, you did not seek a probable cause
13 warrant for any other suspects in this case,
14 correct?
15 MS. SCHULTZ: Object to form and
16 foundation.
17 THE WITNESS: That's correct.
18 BY MR. PAGLIUCA:
19 Q. And Ms. Ghislaine Maxwell is not listed in
20 any of your Palm Beach Police Department incident
21 reports as a suspect in this case, correct?
22 MS. SCHULTZ: Object to form and
23 foundation.
24 THE WITNESS: Not -- no, not as a suspect
25 in this case, no.

1 JOSEPH RECAREY - CONFIDENTIAL
2 Exhibit 1. Are you with me?
3 A. Uh-huh.
4 Q. Okay. Again, this was information that
5 was obtained by Detective Pagan, correct?
6 A. Correct.
7 Q. And it's true, is it not, that this
8 alleged victim never claimed to have been recruited
9 by Ghislaine Maxwell; true?
10 MS. SCHULTZ: Object to form and
11 foundation.
12 THE WITNESS: Correct.
13 BY MR. PAGLIUCA:
14 Q. And this individual, alleged victim No. 1,
15 never identified Ghislaine Maxwell as being at
16 Mr. Epstein's house when she was there, correct?
17 MS. SCHULTZ: Object to form and
18 foundation.
19 THE WITNESS: I don't believe so.
20 BY MR. PAGLIUCA:
21 Q. You don't believe so --
22 A. I don't believe so.
23 Q. That she ever identified Ghislaine Maxwell
24 as being in the house?
25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. Okay. She never -- this individual,
3 victim No. 1, never claimed that Ghislaine Maxwell
4 paid her any money, correct?
5 A. Correct.
6 Q. And this individual No. 1 never claimed
7 that Ms. Maxwell instructed her what to wear,
8 correct?
9 A. Right.
10 Q. This individual never claimed that
11 Ghislaine Maxwell told her how to act, correct?
12 A. Correct.
13 Q. This individual never claimed to have met
14 Ghislaine Maxwell ever, correct?
15 A. I don't believe so, no.
16 Q. This individual never claimed to even have
17 spoken to Ghislaine Maxwell ever, correct?
18 A. I don't believe so, no.
19 Q. And when you say "I don't believe so, no,"
20 that means my statement to you is correct; is that
21 right?
22 MS. SCHULTZ: Object to form, foundation.
23 THE WITNESS: Well, you're saying "ever."
24 I don't know if she's ever, ever spoken to --
25

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. PAGLIUCA:
3 Q. To Detective Pagan.
4 A. Right. To my knowledge, I don't know,
5 because Detective Pagan is the one who actually
6 interviewed her. So I don't know to the answer of
7 "ever." So not to my knowledge.
8 Q. Certainly, nothing in Exhibit 1, Narrative
9 1 reflects that this individual ever met or talked
10 to or spoke to Ghislaine Maxwell, right?
11 A. Right. Not to my knowledge.
12 Q. And, indeed, you would agree with me that
13 if this individual claimed that Ms. Maxwell had
14 something to do with the events listed in Narrative
15 1, you would have folded up on it, as the
16 investigating detective, right?
17 MS. SCHULTZ: Object to the form.
18 THE WITNESS: Either myself or Detective
19 Pagan would have.
20 BY MR. PAGLIUCA:
21 Q. Sure. And when you got the case six
22 months later, if there hadn't been follow-up, you
23 would have followed up on it, right?
24 MS. SCHULTZ: Object to form.
25 THE WITNESS: Correct.

1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. Okay. The person alleged to have brought
3 the alleged victim No. 1 to Mr. Epstein's house is
4 this Hayley Robson individual, correct?
5 A. Yes.
6 Q. Okay. Then with regard to alleged victim
7 No. 2, then this individual did not claim to have
8 been recruited by Ms. Maxwell, correct?
9 MS. SCHULTZ: Object.
10 THE WITNESS: Who would be victim No. 2?
11 BY MR. PAGLIUCA:
12 Q. Well, you can either go to the second page
13 of Exhibit 1 and we can just follow down the victim
14 information, or you can go to the body of the
15 report, whichever is easier for you.
16 MS. SCHULTZ: Can you use the initials?
17 MR. PAGLIUCA: Sure. I can call them 1 or
18 AH or whatever you want to call them. That's
19 fine with me.
20 BY MR. PAGLIUCA:
21 Q. So I'll just say alleged victim AH never
22 claimed to have been recruited by Ms. Maxwell,
23 correct?
24 A. Correct.
25 Q. And alleged victim AH did not claim to

1 JOSEPH RECAREY - CONFIDENTIAL
2 have spoken to Ms. Maxwell ever, correct?
3 MS. SCHULTZ: Object to form.
4 THE WITNESS: It's been a while since I
5 read this report.
6 BY MR. PAGLIUCA:
7 Q. Sure. Is it fair to say, Detective, that
8 this investigation occurred some 12 years ago,
9 right?
10 A. Yeah. Well, yeah.
11 Q. And is it fair to say that you've
12 conducted quite a few investigations over your
13 career?
14 A. Yes.
15 Q. All right.
16 And it's fair to say that it would be
17 impossible for you to remember all the details of
18 this investigation as you sit here today, correct?
19 A. Correct.
20 Q. And you've been referring to Exhibit 1
21 frequently throughout this deposition, correct?
22 A. Yes.
23 Q. And that's because you don't have any
24 present memory of these details, correct?
25 MS. SCHULTZ: Object to form, foundation.

1 JOSEPH RECAREY - CONFIDENTIAL
2 THE WITNESS: I have some recollection,
3 but I'm not going to have exact dates and times
4 off the top of my head.
5 BY MR. PAGLIUCA:
6 Q. Sure.
7 A. You know, I spoke to over 33 girls
8 regarding this case. So when you say an initial, it
9 takes me a little while to go through the entire
10 list. But to have specifics, I'm not going to be
11 able to remember the exact specifics of -- of the
12 report.
13 Q. I appreciate that.
14 So we can take our time, but do you
15 recall, did AH ever identify Ms. Maxwell has someone
16 she spoke to?
17 A. I don't recall.
18 Q. You don't recall at all?
19 A. I don't recall that she had mentioned
20 Ms. Maxwell.
21 Q. And if she had, you would have put that in
22 your report, correct?
23 A. I believe so, yes, I would have.
24 Q. All right.
25 And so the absence of alleged victim AH

1 JOSEPH RECAREY - CONFIDENTIAL
2 referring to Ms. Maxwell means that she didn't,
3 right?
4 MS. SCHULTZ: Object to form.
5 THE WITNESS: Say the question one more
6 time.
7 BY MR. PAGLIUCA:
8 Q. When we go through this report, and I've
9 gone through it, if any of the alleged victims had
10 identified Ms. Maxwell as someone that they spoke to
11 at Mr. Epstein's house, you would have listed that
12 in your report, right?
13 MS. SCHULTZ: Object to form.
14 THE WITNESS: I believe I would have, yes.
15 BY MR. PAGLIUCA:
16 Q. Yeah.
17 You tried to be thorough and accurate when
18 you were writing your reports, right?
19 A. Yes.
20 Q. And, certainly, you've indicated on direct
21 examination that the identity of people who were at
22 the house was something that was important to your
23 investigation, correct?
24 A. Yes.
25 Q. And that's why you did trash pulls, right?

1 JOSEPH RECAREY - CONFIDENTIAL
2 A. Yes.
3 Q. And then you asked various individuals who
4 was there when you went to Mr. Epstein's house,
5 right?
6 A. Correct.
7 Q. And you then, to the best of your ability,
8 recorded those answers, I take it, as to who was
9 there, right?
10 A. Yes.
11 Q. And with regard to AH, she never said
12 anything about Ghislaine Maxwell being at
13 Mr. Epstein's house, did she?
14 MS. SCHULTZ: Object to form and
15 foundation.
16 BY MR. PAGLIUCA:
17 Q. To you?
18 A. I don't believe she did.
19 Q. Okay. And if she did, it's likely that
20 you would have recorded it, correct?
21 A. Correct, and it would be on the -- it
22 would be on the tape.
23 Q. Right.
24 She never claimed, AH, that Ms. Maxwell
25 paid her, right?

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to form and
3 foundation.
4 THE WITNESS: Correct.
5 BY MR. PAGLIUCA:
6 Q. She never claimed that -- AH never claimed
7 that Ms. Maxwell instructed her about what to wear,
8 correct?
9 MS. SCHULTZ: Object to the form.
10 THE WITNESS: Correct.
11 BY MR. PAGLIUCA:
12 Q. AH never claimed that Ms. Maxwell told her
13 how to act at Mr. Epstein's house, correct?
14 MS. SCHULTZ: Object to form.
15 THE WITNESS: Correct.
16 BY MR. PAGLIUCA:
17 Q. AH never claimed to have met Ghislaine
18 Maxwell anywhere, correct?
19 MS. SCHULTZ: Object to form.
20 THE WITNESS: I don't believe so, no.
21 BY MR. PAGLIUCA:
22 Q. Okay. If we go on to individual alleged
23 victim No. 3, AY, the same question: AY never
24 identified Ms. Maxwell as someone she knew or
25 interacted with in any fashion, correct?

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to form.
3 THE WITNESS: No.
4 BY MR. PAGLIUCA:
5 Q. No, she did not?
6 A. No, she did not.
7 Q. Okay. The same with individual No. 4,
8 alleged victim FP: Again, FP never claimed to have
9 met with Ms. Maxwell, correct?
10 MS. SCHULTZ: Object to form and
11 foundation.
12 THE WITNESS: I don't believe so, no.
13 BY MR. PAGLIUCA:
14 Q. Okay. And FP never identified Ms. Maxwell
15 as someone being at Mr. Epstein's house, correct?
16 MS. SCHULTZ: Object to form and
17 foundation.
18 BY MR. PAGLIUCA:
19 Q. And if you need to look at your report --
20 A. No, I don't -- I don't believe so. The
21 only people that recalled Ghislaine at the house
22 was --
23 Q. Sjoberg?
24 A. Johanna Sjoberg.
25 Q. Who was over the age of 18, correct?

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to form and
3 foundation.
4 THE WITNESS: And Venero, Christina
5 Venero.
6 BY MR. PAGLIUCA:
7 Q. Who is an adult as well?
8 MS. O'CONNOR: Object to form.
9 THE WITNESS: Yes.
10 BY MR. PAGLIUCA:
11 Q. So out of your entire report, the only two
12 people who ever said anything about Ms. Maxwell were
13 Ms. Sjoberg, who I believe was 23 when you
14 interviewed her?
15 A. Right, but she was --
16 MS. SCHULTZ: Object to form and
17 foundation.
18 THE WITNESS: She was -- she had worked
19 there for quite some time, so you would have to
20 back up, I think, a year or two.
21 BY MR. PAGLIUCA:
22 Q. She was an adult when she worked there?
23 A. Right. She was over the age of 18, right,
24 let's put it that way.
25 Q. And she was not listed by you as a victim

1 JOSEPH RECAREY - CONFIDENTIAL
2 as part of this case, right?
3 A. Correct, because it was between two
4 consenting adults.
5 Q. Exactly.
6 And so that's Ms. Sjoberg, and then the
7 other individual, I think you said Bolero; is that
8 right?
9 A. Venero, Christina Venero. She's a --
10 Q. Adult masseuse, correct?
11 A. Yes. I remember she had lots of tattoos.
12 Q. Tatts, right.
13 But the 17 individuals that you listed in
14 Exhibit 1, none of those individuals ever said the
15 word -- the words "Ghislaine Maxwell" during the
16 course of this investigation to you, correct?
17 MS. SCHULTZ: Object to form and
18 foundation.
19 THE WITNESS: I don't believe so. It
20 would be on the tapes if they did.
21 BY MR. PAGLIUCA:
22 Q. Well, or it would be in your report,
23 right?
24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL
2 THE WITNESS: Either in the report or on
3 the tapes.
4 BY MR. PAGLIUCA:
5 Q. That's an interesting point, so let's talk
6 about that for a moment.
7 This report, this Palm Beach Police
8 Department incident report, Exhibit 1, is a summary
9 of your investigation, correct?
10 A. Correct.
11 Q. And these recitations of your interviews
12 are abbreviated summaries, correct?
13 A. Correct.
14 Q. And so you're typing into this report
15 parts of it but not every word verbatim into the
16 report, correct?
17 A. Right.
18 Q. And, again, the originals of these tapes
19 are somewhere with the FBI at this point, correct?
20 MS. SCHULTZ: Object to form and
21 foundation.
22 THE WITNESS: Correct. Or at the State
23 Attorney's Office.
24 BY MR. PAGLIUCA:
25 Q. Are you aware of any of these originals

1 JOSEPH RECAREY - CONFIDENTIAL
2 That would be one. Probably victim JB would be
3 another. I believe there was a victim ML, as well.
4 Q. Let me ask this question: As you sit here
5 today, do you know who the subjects of the four
6 counts that are referenced on the first page of
7 Exhibit 7 are?
8 A. If I went through the entire PC affidavit,
9 I could -- I could tell you who. But I just named
10 three.
11 Q. Okay.
12 A. So, like I said, I can go through it and
13 tell you who exactly those four counts were for.
14 Q. Okay. We are limited to four, though,
15 right?
16 A. Four instances.
17 MS. SCHULTZ: Object to form.
18 BY MR. PAGLIUCA:
19 Q. Right.
20 And then throughout this entire 22-page,
21 Palm Beach Police Department affidavit,
22 Ms. Maxwell's name does not appear in here once,
23 does it?
24 MS. SCHULTZ: Object to form.
25 THE WITNESS: I don't believe so, no.

1 JOSEPH RECAREY - CONFIDENTIAL
2 A. Correct.
3 Q. And then Mr. Epstein is arrested and ends
4 up pleading guilty and all of that, right?
5 MS. SCHULTZ: Object to form.
6 THE WITNESS: I think there was a
7 non-prosecution agreement prepared between the
8 Feds and some kind of agreement was made. But,
9 yes, he did end up pleading guilty.
10 BY MR. PAGLIUCA:
11 Q. All right.
12 Now, based on the questions that were
13 asked of you in the grand jury, it's fair to say
14 that Ms. Maxwell was not a target of the grand
15 jury's investigation, correct?
16 MS. SCHULTZ: Object to form and
17 foundation.
18 THE WITNESS: Not based on the questions
19 that the state was asking me, no, the state
20 wasn't...
21 BY MR. PAGLIUCA:
22 Q. In fact, it's fair to say that you never
23 said Ms. Maxwell's name in the grand jury, right?
24 MS. SCHULTZ: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL
2 THE WITNESS: No. Based on the questions
3 that the state was asking, no.
4 BY MR. PAGLIUCA:
5 Q. Were you aware of who was being issued
6 subpoenas by the grand jury?
7 A. No. But it wasn't the actual subpoena
8 from the grand jury; it came from the State
9 Attorney's Office.
10 Q. At the direction of the grand jury,
11 though, right?
12 MS. SCHULTZ: Object to form and
13 foundation.
14 THE WITNESS: I don't know. Again, I
15 don't know.
16 BY MR. PAGLIUCA:
17 Q. I would like to talk a little bit about
18 the surveillance that you initiated at Mr. Epstein's
19 house, okay?
20 Can you tell me when the surveillance
21 began?
22 A. It would have started under Detective
23 Pagan and gone through --
24 Q. The entire investigation?
25 A. Pretty much trash pulls. We stopped the

1 JOSEPH RECAREY - CONFIDENTIAL
2 actual physical surveillance sometime during the
3 investigation. But it would have started under
4 Pagan.
5 Q. Okay. Do you recall in what -- well, how
6 was surveillance conducted, if you recall?
7 A. I didn't conduct it personally, no. That
8 would have been under plainclothes unit team. They
9 would have sent out a vehicle and recorded vehicles
10 coming and going and actual physical surveillance.
11 Q. So physical surveillance means eyes on the
12 property, correct?
13 A. Right.
14 Q. And eyes on the property by a police
15 officer, correct?
16 A. Correct.
17 Q. And that police officer would be charged
18 with the obligation of recording the incomings and
19 outgoings of people to the property, correct?
20 A. Correct.
21 Q. Is there a log that's maintained during
22 surveillance?
23 A. I'm not sure who -- if there was a log or
24 not. I know that they set up a vehicle with cameras
25 facing -- facing Epstein's residence.

1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. And so these were video cameras?
3 A. Correct.
4 Q. And so whoever was coming and going,
5 whenever -- an officer saw somebody coming or going,
6 they would videotape that person; is that correct?
7 A. Or they would just leave the video
8 rolling, time lapse.
9 Q. And did you have the opportunity to
10 observe any of that video?
11 A. I did observe a couple, but the person who
12 actually set it up would review it and then submit a
13 supplement to the report.
14 Q. Okay. It's true that none of the video of
15 the surveillance led to the identification of
16 Ghislaine Maxwell as coming or leaving the house
17 during the time of surveillance, correct?
18 MS. SCHULTZ: Object to form and
19 foundation.
20 THE WITNESS: I don't know. I didn't see
21 all of the video, so I can't -- I can't attest
22 to that.
23 BY MR. PAGLIUCA:
24 Q. Okay. Did anybody report to you that
25 Ms. Maxwell was seen coming or going?

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to form, foundation.
3 THE WITNESS: I don't recall.
4 BY MR. PAGLIUCA:
5 Q. If someone had reported to you that
6 Ms. Maxwell was seen coming or going, you would have
7 recorded it in your Palm Beach Police Department
8 incident report, Exhibit No. 1, correct?
9 MS. SCHULTZ: Object to form and
10 foundation.
11 THE WITNESS: I would have told the
12 officer who was conducting the surveillance or
13 reviewing the video to document it in the
14 supplements.
15 BY MR. PAGLIUCA:
16 Q. And there is no documentation in the
17 supplement of Ms. Maxwell either coming or going
18 from Mr. Epstein's house during this time frame,
19 correct?
20 MS. SCHULTZ: Object to the form.
21 THE WITNESS: I don't believe so. I
22 don't -- I don't -- I don't believe so.
23 BY MR. PAGLIUCA:
24 Q. And, again, so we're on the same page,
25 when you say "I don't believe so," I interpret that

1 JOSEPH RECAREY - CONFIDENTIAL
2 THE WITNESS: Correct.
3 BY MR. PAGLIUCA:
4 Q. And none of these individuals was employed
5 as a massage therapist at the time of their alleged
6 involvement with Mr. Epstein, correct?
7 A. Correct.
8 Q. Each of these individuals, as I recall,
9 claimed to have been paid directly by Mr. Epstein or
10 Ms. Kellen, correct?
11 MS. SCHULTZ: Object to form and
12 foundation.
13 THE WITNESS: Correct.
14 BY MR. PAGLIUCA:
15 Q. Most often, these individuals, these 17
16 individuals, were paid directly by Mr. Epstein,
17 correct?
18 MS. SCHULTZ: Object to form and
19 foundation.
20 THE WITNESS: Mr. Epstein or Sarah Kellen.
21 BY MR. PAGLIUCA:
22 Q. Okay. None of these individuals identify
23 Ms. Maxwell as someone who was paying them money,
24 correct?
25 MS. SCHULTZ: Object to form and

1 JOSEPH RECAREY - CONFIDENTIAL
2 foundation.
3 THE WITNESS: I don't believe so, no.
4 BY MR. PAGLIUCA:
5 Q. And each of these individuals identified
6 receiving cash, correct?
7 MS. SCHULTZ: Object to the form.
8 THE WITNESS: Correct.
9 BY MR. PAGLIUCA:
10 Q. Each of these individuals claimed varying
11 amounts, generally between $200 and up to $1,000,
12 correct?
13 MS. SCHULTZ: Object to form.
14 THE WITNESS: Correct.
15 BY MR. PAGLIUCA:
16 Q. According to each of these individuals,
17 Mr. Epstein, when the massage was over, would either
18 hand them the money -- that happened according to
19 these individuals, right?
20 MS. SCHULTZ: Object to form.
21 THE WITNESS: At times, yes.
22 BY MR. PAGLIUCA:
23 Q. Or Mr. Epstein had laid out the money
24 somewhere and directed them to where to go get it,
25 correct?

1 JOSEPH RECAREY - CONFIDENTIAL
2 A. I don't believe clothing was seized.
3 Q. To your knowledge, did you seize any
4 property belonging to Ghislaine Maxwell from the
5 home?
6 MS. SCHULTZ: Object to form and
7 foundation.
8 THE WITNESS: I'm not sure. Not to my
9 knowledge.
10 BY MS. SCHULTZ:
11 Q. Okay. No one ever came to you and said,
12 Could you please return these items to Ms. Maxwell,
13 correct?
14 MS. SCHULTZ: Object to form.
15 THE WITNESS: No.
16 BY MS. SCHULTZ:
17 Q. All right.
18 You did that with Janush?
19 A. Yes, he had photos and --
20 Q. But nothing like that ever happened with
21 Ms. Maxwell, correct?
22 MS. SCHULTZ: Object to form.
23 THE WITNESS: No.
24 BY MS. SCHULTZ:
25 Q. Ms. Maxwell was not present when you

1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. Any way that you get contacted by a police
3 officer, if they put it into your database, it will
4 come up when you do the CAD search, correct?
5 A. Right.
6 Q. And that's all that came up with regard to
7 Ms. Maxwell, was her name was somewhere in the
8 system. Do you know or not know?
9 MS. SCHULTZ: Object to form and
10 foundation.
11 THE WITNESS: I don't know.
12 MR. PAGLIUCA: Okay.
13 (The referred-to document was marked by
14 the court reporter for Identification as
15 Deposition Exhibit 12.)
16 BY MR. PAGLIUCA:
17 Q. I have handed you what has been marked as
18 Deposition Exhibit 12, which I will represent to you
19 are the Plaintiff in this case, Ms. Giuffre's Rule
20 26 disclosure.
21 I want to just go through very quickly and
22 ask you if you know any of these individuals.
23 So, let's start with No. 1, Virginia
24 Giuffre. Have you ever met Virginia Giuffre?
25 A. No.

1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. Have you ever talked to her?
3 A. I don't recall.
4 Q. Do you know what information that she may
5 have that's referenced below? Conducted is the
6 subject of this action. Do you have any knowledge
7 of that?
8 MS. O'CONNOR: Object to form.
9 THE WITNESS: No.
10 BY MR. PAGLIUCA:
11 Q. Number 2, Ghislaine Maxwell, I'm going to
12 come back to her.
13 Number 3, Juan Alessi, you did interview
14 Mr. Alessi, correct?
15 A. Yes.
16 Q. I have seen a transcript of that
17 interview, and I have seen Exhibit 2, which is a
18 transcript of the interview with Ms. ████. I want
19 to ask you a couple of questions about the
20 transcription process.
21 As I understand your testimony previously,
22 the electronic recordings are sent somewhere, you
23 don't know where, for transcription; is that right?
24 MS. SCHULTZ: Object to form.
25 THE WITNESS: I didn't request a

1 JOSEPH RECAREY - CONFIDENTIAL
2 different investigators Mr. Black uses in a
3 particular calendar year, do you?
4 MS. SCHULTZ: Object to form.
5 THE WITNESS: No.
6 BY MR. PAGLIUCA:
7 Q. And so you don't know whether Mr. Black's
8 association with this law firm was in connection
9 with Mr. Epstein's case or some other case, do you?
10 MS. SCHULTZ: Object to form.
11 THE WITNESS: I worked this case,
12 nothing -- nothing but this case for an entire
13 year. This was my only case for a year.
14 BY MR. PAGLIUCA:
15 Q. Okay. That's it?
16 A. If it walks like a duck.
17 MS. SCHULTZ: Objection.
18 BY MR. PAGLIUCA:
19 Q. Okay. So we're finished with Dershowitz.
20 Keep on going.
21 A. Number 28, obviously, [REDACTED].
22 Q. Okay. And you've talked about her?
23 A. Right.
24 Q. And, again, she never discussed Ghislaine
25 Maxwell with you, correct?

1 JOSEPH RECAREY - CONFIDENTIAL
2 Q. Right. So you're 75. So I want you -- I
3 want to take a moment and read what's under 75:
4 "Detective Recarey was the chief investigator of the
5 crimes committed at Jeffrey Epstein's Palm Beach
6 mansion." Is that true?
7 MS. SCHULTZ: Object to form.
8 THE WITNESS: Yes.
9 BY MR. PAGLIUCA:
10 Q. "And has information about Ghislaine
11 Maxwell and Jeffrey Epstein's sexual trafficking
12 conduct and interaction with underaged minors."
13 Tell me everything that you believe you
14 know about Ghislaine Maxwell's sexual trafficking
15 conduct.
16 MS. SCHULTZ: Object to form.
17 THE WITNESS: I don't.
18 BY MR. PAGLIUCA:
19 Q. So that's inaccurate, then? I mean, you
20 have no knowledge about Ghislaine Maxwell sexually
21 trafficking anybody, do you?
22 MS. SCHULTZ: Object to form.
23 THE WITNESS: Not with -- not with the
24 girls that I spoke with, no.
25

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. PAGLIUCA:
3 Q. But that's your investigation, right?
4 A. Right.
5 Q. Okay.
6 A. Right.
7 Let's see. Seventy-six.
8 Q. Okay. And you've talked about her.
9 Whatever happened to her, do you know?
10 MS. SCHULTZ: Object to form.
11 BY MR. PAGLIUCA:
12 Q. Haley Robson?
13 A. No.
14 Q. She was never charged, as I understand it,
15 correct?
16 A. Correct.
17 Q. And after you spoke to her in connection
18 with your investigation, did you ever speak to her
19 again?
20 A. No.
21 Q. Okay.
22 A. David Rogers, 77.
23 Q. And you know him because he was identified
24 as one of the pilots for Mr. Epstein, right?
25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL
2 in your mind, right? Correct?
3 MS. SCHULTZ: Object to the form.
4 THE WITNESS: Yes.
5 BY MR. PAGLIUCA:
6 Q. And you're a peace officer, obligated to
7 arrest when a felony is committed in your presence,
8 correct?
9 A. Correct.
10 Q. And the possession of child pornography is
11 a felony, correct?
12 A. Correct.
13 Q. And had you seen any child pornography in
14 Mr. Epstein's house when you were there installing
15 these cameras, you would have done something about
16 it, correct?
17 MS. SCHULTZ: Object for form.
18 THE WITNESS: Right.
19 BY MR. PAGLIUCA:
20 Q. You wouldn't have just walked out and
21 said, Nice pics, have a nice day, correct?
22 A. Correct.
23 Q. So is it fair to say the entire time you
24 were in Epstein's house, whether it's 2002, 2003,
25 you did not observe any child pornography, right?

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to the form.
3 THE WITNESS: Not in the areas I was in.
4 BY MR. PAGLIUCA:
5 Q. You don't recall seeing any pictures of
6 naked women, do you?
7 MS. SCHULTZ: Object to form.
8 THE WITNESS: Again, I was only confined
9 to where that desk was. That's where I set up
10 the camera, and then after it was set up, I
11 left.
12 BY MR. PAGLIUCA:
13 Q. Okay. But, again, all I'm asking you is
14 wherever you were, you didn't see any pictures of
15 naked women?
16 A. Right. No, I didn't see any.
17 Q. And at the time you recall that he had
18 these surveillance cameras already installed; is
19 that true? Other cameras, the clock cameras?
20 MS. SCHULTZ: Object to form.
21 THE WITNESS: I'm not sure if he had the
22 cameras installed or not. I can't recall.
23 BY MR. PAGLIUCA:
24 Q. Why would he need your cameras if he
25 already had cameras?

1 JOSEPH RECAREY - CONFIDENTIAL
2 None of these alleged victims claimed to
3 have ever traveled with Mr. Epstein, correct?
4 MS. SCHULTZ: Object to form.
5 THE WITNESS: No.
6 BY MR. PAGLIUCA:
7 Q. No, they did not? They did not travel
8 with Mr. Epstein, right?
9 MS. SCHULTZ: Object to form.
10 THE WITNESS: I don't believe so, no.
11 BY MR. PAGLIUCA:
12 Q. None of them reported that to you?
13 A. Not reported, correct.
14 Q. None of them reported to you that they
15 ever spent the night with Mr. Epstein, did they?
16 MS. SCHULTZ: Object to form.
17 THE WITNESS: I don't believe so.
18 BY MR. PAGLIUCA:
19 Q. None of them ever reported being
20 trafficked by Mr. Epstein to other men, correct?
21 MS. SCHULTZ: Object to form, foundation.
22 THE WITNESS: I don't believe so.
23 BY MR. PAGLIUCA:
24 Q. The only other men that any of these
25 alleged victims -- the only man that any of these

1 JOSEPH RECAREY - CONFIDENTIAL
2 alleged victims ever claimed to have any contact
3 with that was sexual in nature was Mr. Epstein,
4 correct?
5 MS. SCHULTZ: Object to form and
6 foundation.
7 THE WITNESS: Yes.
8 BY MR. PAGLIUCA:
9 Q. Okay. None of these alleged victims ever
10 claimed to have been sent to another location to
11 have sex with another man, correct?
12 MS. SCHULTZ: Object to form and
13 foundation.
14 THE WITNESS: I don't believe so.
15 BY MR. PAGLIUCA:
16 Q. Meaning my statement is correct; is that
17 right?
18 MS. SCHULTZ: Object to form.
19 BY MR. PAGLIUCA:
20 Q. I'm just trying to --
21 A. Meaning I don't believe they've ever said
22 that. I don't recall any of them ever saying...
23 Q. Had they claimed that they were sent
24 somewhere else to have sex with another man, you
25 would have followed up on that, correct?

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to form.
3 THE WITNESS: Correct.
4 BY MR. PAGLIUCA:
5 Q. And none of them ever claimed to have been
6 sent to another location to give another man a
7 massage, correct?
8 MS. SCHULTZ: Object to form.
9 THE WITNESS: No, not the victims.
10 BY MR. PAGLIUCA:
11 Q. Right. That's who I'm talking about.
12 A. I believe [redacted] did.
13 Q. Who is an adult, right?
14 MS. SCHULTZ: Object to form.
15 THE WITNESS: Right.
16 BY MR. PAGLIUCA:
17 Q. We covered this, I believe: None of them
18 ever was on Mr. Epstein's airplane, correct?
19 MS. SCHULTZ: Object to form.
20 THE WITNESS: I believe one of the victims
21 were, but not to a private island. I think
22 they went -- they didn't go to a private
23 island; they went to some other trip.
24 BY MR. PAGLIUCA:
25 Q. I think maybe you're referring to AH, who

1 JOSEPH RECAREY - CONFIDENTIAL
2 went to New York but on a commercial flight. Does
3 that jog your memory?
4 MS. SCHULTZ: Object to form.
5 THE WITNESS: No.
6 BY MR. PAGLIUCA:
7 Q. Okay. Do you recall who it is?
8 A. It would have been FP.
9 Q. Okay. Was on Mr. Epstein's airplane?
10 MS. SCHULTZ: Object to form.
11 THE WITNESS: I believe so.
12 BY MR. PAGLIUCA:
13 Q. Would that be reflected in Exhibit 1?
14 MS. SCHULTZ: Object to form.
15 THE WITNESS: But she flew alone. It
16 wasn't like Epstein was there. She went
17 someplace else, not to his private island,
18 nothing to do with Epstein. It was something
19 she wanted to do. And I think she flew on his
20 plane, but it was, like, her by herself.
21 BY MR. PAGLIUCA:
22 Q. Alone.
23 A. Right.
24 Q. With a pilot?
25 A. Right.

1 JOSEPH RECAREY - CONFIDENTIAL
2 MS. SCHULTZ: Object to form.
3 BY MR. PAGLIUCA:
4 Q. None of the alleged victims in your
5 investigation claimed to have gone to the Caribbean
6 island of Little St. James, correct?
7 MS. SCHULTZ: Object to form.
8 THE WITNESS: No.
9 BY MR. PAGLIUCA:
10 Q. "No" meaning they never went there,
11 correct?
12 MS. SCHULTZ: Object to form.
13 THE WITNESS: Not that I'm aware of.
14 BY MR. PAGLIUCA:
15 Q. None of the alleged victims ever went to
16 Mr. Epstein's New York residence, to your knowledge,
17 correct?
18 MS. SCHULTZ: Object to form.
19 THE WITNESS: Not that I'm aware of.
20 BY MR. PAGLIUCA:
21 Q. None of them ever reported that to you?
22 MS. SCHULTZ: Object to form.
23 THE WITNESS: No.
24 BY MR. PAGLIUCA:
25 Q. Okay. And none of them ever claimed to

1 JOSEPH RECAREY - CONFIDENTIAL
2 have been outside of the country with Mr. Epstein,
3 ever, correct?
4 MS. SCHULTZ: Object to the form.
5 THE WITNESS: Not that I'm aware of.
6 MR. PAGLIUCA: Can we go off for a second?
7 Time check.
8 THE VIDEOGRAPHER: Off the record at 4:13.
9 (Thereupon, a recess was taken, after
10 which the following proceedings were held:)
11 THE VIDEOGRAPHER: On the record at 4:14.
12 BY MR. PAGLIUCA:
13 Q. Can you take a look at Exhibit 4, please?
14 A. Which one is 4?
15 Q. Four is the True Copy. That's what it
16 says at the top. Exhibit 4. Six pages.
17 A. Yes.
18 Q. Do you have that?
19 A. Yes, sir.
20 Q. There's yellow highlighting on the exhibit
21 that's in front of you.
22 Do you know how that got there?
23 A. No.
24 Q. And there's a -- there are numbers, item
25 numbers. Do you see that in the left column?

2

3 CERTIFICATE OF OATH

4 STATE OF FLORIDA)

5 COUNTY OF MIAMI-DADE)

6

7 I, the undersigned authority, certify

8 that JOSEPH RECAREY personally appeared before me

9 and was duly sworn.

10 WITNESS my hand and official seal this

11 24th day of June, 2016.

12

13

KELLI ANN WILLIS, RPR, CRR

14 Notary Public, State of Florida

My Commission No. EE911443

15 Expires: 2/16/16

16 + + + + + + + + + + + + + + + + + +

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2

3 C E R T I F I C A T E

4 STATE OF FLORIDA)

: ss

5 COUNTY OF MIAMI-DADE)

6 I, KELLI ANN WILLIS, a Registered

7 Professional, Certified Realtime Reporter and

8 Notary Public within and for The State of

9 Florida, do hereby certify:

10 That JOSEPH RECAREY, the witness whose

11 deposition is hereinbefore set forth was duly

12 sworn by me and that such Deposition is a true

13 record of the testimony given by the witness.

14 I further certify that I am not related

15 to any of the parties to this action by blood

16 or marriage, and that I am in no way interested

17 in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set

19 my hand this 24th day of June, 2016.

20

21 ___________________________

KELLI ANN WILLIS, RPR, CRR

22

23

24

25

EXHIBIT HH

IN THE CIRCUIT COURT OF THE
SEVENTEENTH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY,
FLORIDA

CASE NO.: CACE 15-000072

EDWARDS, *et al.*,

Plaintiffs / Counterclaim Defendants,

v.

DERSHOWITZ,

Defendant / Counterclaim Plaintiff.
_______________________________________/

AFFIDAVIT OF JUAN P. ALESSI
REGARDING KNOWLEDGE OF ALAN M. DERSHOWITZ

A. Introduction

1. My name is Juan P. Alessi. I make this declaration voluntarily and without compensation on personal knowledge concerning Alan Dershowitz and his visits at my former employer Jeffrey Epstein's home in Palm Beach, Florida.

2. I worked for Mr. Epstein from January 1991 to December 2002 as a full-time employee performing maintenance services and then also became the manager for the home on 358 El Brillo Way in Palm Beach, Florida.

3. Since Mr. Epstein was investigated and arrested, I have spoken with police, investigators, and attorneys concerning my time working for Mr. Epstein.

4. On September 8, 2009, I gave a deposition in the case captioned *Jane Doe No. 2 v. Jeffrey Epstein*, Case No. 08-CV-80119 in which I truthfully answered the questions posed by the attorneys. I also gave a sworn statement on November 21, 2005 to

Detective Joseph Recarey of the Palm Beach P.D. during their investigation of Mr. Epstein.

5. I have reviewed the statements that Bradley Edwards and Paul Cassell attribute to me in their papers in the cases against the Government and against Mr. Dershowitz. Because I do not believe they accurately reflect the statements I previously made, I submit this affidavit to have my statements accurately reflected and made clear on the record.

B. Summary of My Knowledge of Massages at Mr. Epstein's Palm Beach Home

6. As I stated in my deposition, a massage was like a treat for all the guests at Mr. Epstein's home. Mr. Epstein usually received his massages in his private suite, but guests would also be given massages in their respective rooms or by the pool area.

7. There were between fifty (50) to one hundred (100) masseuses – mostly women but also some men - who would come to give massages during this time. I provided names of masseuses in my deposition.

8. As I stated in my deposition, I was unaware of any masseuses being under the age of 18. I believed that the females' age ranged from overage to maybe mid-forties. As I stated in my deposition, I received as a gift a massage from a male masseuse at Mr. Epstein's home in Palm Beach.

9. In my deposition, I was asked about cleaning up after massages. I stated that when I cleaned Mr. Epstein's bedroom suite, which included the bathroom of Ms. Maxwell, after massages, I would, on occasion, find vibrators and sex toys. I have specific recollection of finding these items in the sink of Ms. Maxwell's bathroom. I did not state or imply that vibrators or sex toys were found after massages in other rooms used by guests because that was not the case. Guests having massages did not have

massages in Mr. Epstein's private bedroom suite. This area was private and off-limits to guests, which I explained to the lawyers during my deposition. As I said in my deposition, massage tables were located in almost every room, including guest rooms and by the pool. I never found, and never heard anyone in the house finding, a vibrator or a sex toy in the same room where any guest, including Alan Dershowitz, had a massage.

10. The following statement made by Virginia Roberts's attorneys in a filing on January 21, 2015 is not accurate and is a misrepresentation of what I said in my deposition: "The private, upstairs room where Dershowitz got his 'massages' was one that contained a lot of vibrators – Maxwell had 'a laundry basket . . . full of those toys' in that room."

C. Summary of My Interaction with Alan M. Dershowitz

11. During the approximate thirteen years I worked for Mr. Epstein, I believe I saw Mr. Dershowitz visit Mr. Epstein's Palm Beach home approximately four or five times a year. I recall driving him to the airport on multiple occasions.

12. At the time, I understood that Mr. Dershowitz was a famous lawyer. His visits to the house would typically involve a group of intellectuals or business men in social, but professional type gatherings.

13. I can recall that Mr. Dershowitz had a massage on at least one occasion during a visit to Mr. Epstein's home in Palm Beach (although I cannot recall that Mr. Dershowitz received a massage on more than one occasion). I do not recall Mr. Dershowitz being massaged by anyone who I thought was less than 18 years old. I have no reason to doubt Mr. Dershowitz's statement that this massage was done by a woman named Olga who was in her forties. In fact, I do remember a masseuse named Olga that

lived in Palm Beach, though I do not know her last name. As I have said, I never saw Mr. Dershowitz around young girls. I have also explained that there were masseuses, both male and female, that were in their mid-forties.

14. I never saw Mr. Dershowitz do anything improper or be present while anyone else was being improper.

15. Before asking me about Jeffrey Epstein speaking to celebrities at the house, the attorney for "Jane Doe 102" asked me about Jean Luc Brunel, Mark Epstein, Daniel Estes, Matt Groening, and Leslie Wexner. I then listed Senator Mitchell, Prince Andrew, Princess Sarah Ferguson, Miss Yugoslavia, Miss Germany, Alan Dershowitz, Princess Diana's secretary with her children, Mr. Trump, Mr. Robert Kennedy, Jr., Frederik Fekkai, and a couple Noble prize winners as celebrities that I had seen while working for Mr. Epstein. I also mentioned a reunion of Nobel prize winners that was held at the house, and that I met President Clinton at Mr. Epstein's plane the last month that I was working for Mr. Epstein.

C. Summary of My Interaction with Virginia Roberts

16. The first time I saw Virginia Roberts was at Mar-a-Lago where I believed she worked in the spa. I only recall seeing Virginia Roberts come to Mr. Epstein's house during the last year that I worked for Mr. Epstein. During this time, I believe she visited Mr. Epstein's home in Palm Beach two or three times a week.

17. I never saw any photographs of Virginia Roberts in Mr. Epstein's house. I was shown a photo of Virginia Roberts during my deposition, and I recognized the woman in the photo as Virginia Roberts.

18. As I stated in my deposition, I am not sure whether Virginia Roberts came to the house when Prince Andrew was there.

19. I was never asked by any attorneys if Virginia Roberts came to the house when Mr. Dershowitz was there. If I had been asked, I would have answered that I never saw Virginia Roberts at the house when Mr. Dershowitz was there.

20. The following statement made by Virginia Roberts's attorneys and their own attorney in a filing on December 4, 2015 is not accurate and is a misrepresentation of what I said in my deposition: "Alessi was able to identify a photograph of Ms. Giuffre as someone who was at the mansion as the same time as Dershowitz."

21. As far as I can recall, since I gave my deposition in 2009, I have never been asked by Brad Edwards or Paul Cassell about my knowledge regarding Virginia Roberts or Alan Dershowitz or about my 2009 deposition testimony.

I understand that I am swearing or affirming under oath to the truthfulness of the claims made in this affidavit and that the punishment for knowingly making a false statement includes fines and/or imprisonment.

Dated: January 13, 2016

[signature]
Juan Alessi

STATE OF FLORIDA

COUNTY OF PALM BEACH

Sworn to or affirmed and signed before me on JANUARY 13, 2016
by JUAN PATRICIO ALESSI, who provided his driver's license.

[signature]
NOTARY PUBLIC or DEPUTY CLERK
LINDA S. COHEN
[Print, type, or stamp commissioned name of notary or clerk.]

LINDA S. COHEN
MY COMMISSION #FF022306
EXPIRES: SEP 23, 2017
Bonded through 1st State Insurance

EXHIBIT II

1 IN THE CIRCUIT COURT OF THE 17TH JUDICIAL CIRCUIT
IN AND FOR BROWARD COUNTY, FLORIDA
2 CASE NO. 15-000072

3
BRADLEY J. EDWARDS and PAUL G.
4 CASSELL,

5 Plaintiffs,

6 -vs- **CONFIDENTIAL**

7 ALAN M. DERSHOWITZ,

8 Defendant.
_____________________________________/
9

10 VIDEOTAPED DEPOSITION OF VIRGINIA ROBERTS GIUFFRE

11

12 Saturday, January 16, 2016
9:07 a.m. - 2:48 p.m.
13

14 401 East Las Olas Blvd., Suite 1200
Fort Lauderdale, Florida 33301
15

16

17

18 Reported By:

19 Deborah A. Harris, Court Reporter
Notary Public, State of Florida
20 Phone - 305.651.0706

21
Job No. J0277789
22

23

24

25

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24

25

1 ALSO PRESENT

2

Edward J. Pozzuoli, Special Master
3 Robert Pacheco, Videographer
Ryan Kick, Videographer
4 Bradley J. Edwards
Paul G. Cassell
5 Alan M. Dershowitz
Brittany N. Henderson, Esq.
6 Meridith Schultz, Esquire

7

\- - -

8

I N D E X

9

10

WITNESS	DIRECT	CROSS	REDIRECT	RECROSS
Virginia Roberts Giuffre				
By Ms. Borja	5			
By Mr. Scarola		201		
By Ms. Borja			204	

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13 - - -

14 E X H I B I T S

15

DEFENDANT VR EXHIBITS	FOR ID
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REPORTER'S NOTE: Exhibit 5 marked confidential, sealed, and retained by the Special Master.

22
23
24
25

1 MR. SCAROLA: It is a minor discrepancy,
2 but I think you read it as when she was a minor
3 and it's while she was a minor.
4 BY MS. BORJA:
5 Q. While she was a minor. Do you see where
6 I'm reading starting in the third line?
7 A. Yes.
8 Q. Is that allegation true?
9 A. Yes.
10 Q. If you go to page 6 of the document, do you
11 see the paragraph that's starts, Epstein also trafficked?
12 A. Yes.
13 Q. Is says Epstein also trafficked Jane Doe #3
14 for sexual purposes to many other powerful men including
15 numerous prominent American politicians, powerful
16 business executives, foreign presidents, a well-known
17 prime minister and other world leaders. Do you see that?
18 A. Yes.
19 Q. Is that allegation true?
20 A. Yes.
21 Q. The reference there to foreign presidents,
22 do you see that?
23 A. Yes.
24 Q. You were sexually trafficked to foreign
25 presidents?

1 A. No.
2 Q. So that's not true, you were not sexually
3 trafficked to foreign presidents?
4 A. I don't know what foreign president you're
5 talking about.
6 Q. Have you ever been sexually trafficked to
7 any foreign president?
8 MS. MCCAWLEY: I'm going to allow you to
9 ask that question, but with respect to specific
10 identification of an individual we're not going to
11 do that. At this point she has.
12 MS. BORJA: Counsel, your objection has
13 been made. No speaking objections, please. Let's
14 move on.
15 MS. MCCAWLEY: I can make my record, and my
16 record is she's not going to be speaking with
17 respect to individuals' names that are named in
18 generalities in this document.
19 SPECIAL MASTER: Objection overruled. You
20 can answer.
21 A. I understand well-known prime ministers and
22 other world leaders; as far as foreign presidents, I'm
23 not too sure, I don't know.
24 Q. Have you ever met any foreign presidents?
25 A. Foreign presidents as in overseas?

1 Q. Sure, okay, overseas.
2 A. No.
3 Q. Have you ever met any foreign presidents
4 from countries not overseas such as Canada or Mexico?
5 A. No.
6 Q. So you were not sexually trafficked to any
7 foreign presidents; is that correct?
8 A. As far as I know right now, yes.
9 Q. It's correct that you were not sexually
10 trafficked to them, right?
11 A. You've asked me this three times and I'm
12 telling you.
13 Q. Okay. A well-known prime minister. Were
14 you sexually trafficked to a well-known prime minister?
15 A. Yes.
16 Q. Who was that?
17 MS. MCCAWLEY: I'm going to object to this
18 line of questioning. This has to do with safety
19 concerns for her.
20 MS. BORJA: Counsel, this is under seal.
21 You can answer.
22 MS. MCCAWLEY: No, she's not going to
23 answer.
24 SPECIAL MASTER: Hang on one second.
25 MS. MCCAWLEY: Let me make my objection.

1 SPECIAL MASTER: Okay. I can't twist her
2 arm and force her so we'll deal with it.
3 BY MS. BORJA:
4 Q. Okay. Other world leaders, what other
5 world leaders were you sexually trafficked to?
6 MS. MCCAWLEY: We have the same objection.
7 SPECIAL MASTER: And I would have the same
8 ruling based upon the arguments.
9 MS. MCCAWLEY: Let me just make my record.
10 To the extent that there's a name of an individual
11 that you can reveal that you do not feel would
12 harm your physical safety, you're welcome to
13 reveal them. Anybody else, you don't have to
14 reveal at this time and we'll take that to Judge
15 Lynch.
16 A. Okay. Prince Andrew for one.
17 Q. Other than Prince Andrew?
18 A. There is another individual that I honestly
19 do not know his name.
20 Q. What country is he from?
21 A. I'm not too sure, he spoke in a foreign --
22 he did speak foreign tongue, he spoke English as well,
23 but I'm not too sure where he was from.
24 Q. How do you know he is world leader?
25 A. I was introduced to him as a prince.

1 Q. Okay. Did he have security with him?
2 A. I'm sure he did somewhere around, but not
3 when I was with him.
4 Q. Did you see security?
5 A. No.
6 Q. Did you -- where were you when you met him?
7 A. On this occasion the South of France.
8 Q. Are there witnesses to you being sexually
9 trafficked to this prince?
10 A. Yes.
11 Q. Name them.
12 A. Jeffrey Epstein, Ghislaine Maxwell.
13 Q. Anyone else?
14 A. There was a whole bunch of people in the
15 room so of course.
16 Q. Was this an orgy?
17 A. No.
18 Q. Who else was in the room?
19 A. I can't name them all, there was a lot.
20 Q. Name as many as you can name?
21 A. I don't know their names. I can't name
22 their names.
23 Q. They were present during sexual activity?
24 A. They were present before the sexual
25 activity and then I went to have sexual activity with him

1 alone.
2 Q. So he's the only witness to your sexual
3 activity, the prince?
4 A. On the instruction of Epstein and
5 Ghislaine, yes.
6 Q. Where in the South of France were you?
7 A. I don't know.
8 Q. Were you on a boat, were you in a house?
9 A. We were at a like a cabana, not cabana,
10 like a resort, but it was a big party.
11 Q. Who was throwing the party?
12 A. I don't know. I was just brought there.
13 Q. You also refer to powerful business
14 executives. What powerful business executives were you
15 sexually trafficked to?
16 MS. MCCAWLEY: Again, to the extent you can
17 reveal somebody without a safety concern you're
18 welcome to do that.
19 SPECIAL MASTER: Well, again --
20 MS. MCCAWLEY: Right. I understand.
21 SPECIAL MASTER: Same objection, same
22 ruling.
23 A. George Mitchell.
24 Q. When were you sexually trafficked to George
25 Mitchell?

1 Q. Do you have the originals?
2 A. Again, between the FBI and giving them to
3 my lawyers and Sharon Churcher, the circulation, I'm not
4 too sure if I have the originals. I know I have copies.
5 So I'm not too sure if they're the originals.
6 Q. The booklet that you gave pages from to Ms.
7 Churcher where is that booklet?
8 A. Burned.
9 Q. When did you burn it?
10 A. In, I think it was 2013. Me and my husband
11 had a bonfire.
12 Q. What did you put in the bonfire?
13 A. Any kind of memories that I had written
14 down about all the stuff going on.
15 Q. Had you written anything about Professor
16 Dershowitz?
17 A. He could have been there, yes.
18 Q. And you burned that?
19 A. I wanted to burn my memories. I wanted to
20 get rid of it. It was very painful stuff.
21 Q. Other than what you had written down did
22 you burn anything else? I don't mean the wood, when you
23 talk about burning your memories, what were you burning?
24 A. I was burning like memories, thoughts,
25 dreams that I had, just everything that was kind of

1 affiliated with the abuse I endured, and there was a lot
2 of it in there. My husband is pretty spiritual so he
3 said the best thing to do would be burn them.
4 Q. Is there anything you decided to keep and
5 not burn?
6 A. Just the photographs.
7 Q. Anything else that you can think of?
8 A. Photographs, that's it.
9 Q. Approximately when in 2013 was this
10 bonfire?
11 A. I don't know what month it was.
12 Q. Did you do it outside?
13 A. Yeah, it was outside. I wasn't going to do
14 it in my living room.
15 Q. Did it feel good to be close to the fire
16 because it was cold out or was it a summertime bonfire?
17 A. I believe I had just bought my house in
18 Titusville, Florida. I bought my house in, I think, I
19 either got it October or November of 2013. It would have
20 been around probably November.
21 Q. Why did you decide to keep the photos?
22 A. They're evidence.
23 Q. Do you have any photographs of yourselves
24 with Professor Dershowitz?
25 A. No.

1 Beach, I've seen him in New York. So I mean, if we're
2 going to pin point how many times I've seen him or the
3 next time I saw him after that I don't know.
4 Q. Then tell me -- let's do it this way, what
5 was the most recent time that you recall having sex with
6 Professor Dershowitz?
7 MS. MCCAWLEY: Objection.
8 SPECIAL MASTER: You can answer.
9 A. The first time I recall having sex with
10 Professor Dershowitz was in New York.
11 Q. My question was, the most recent time now.
12 What's the most current, most recent memory of having sex
13 with Professor Dershowitz?
14 MS. MCCAWLEY: Objection. Just so I'm
15 clear, you're going backward?
16 MS. BORJA: Correct.
17 MS. MCCAWLEY: The last time.
18 A. The last time that I remember having sex
19 with him? Okay. I believe it was on an airplane.
20 Q. Where were you going?
21 A. On, I believe it was Massachusetts. I
22 don't know. It's very hard for me to remember exactly
23 where we were going, what were the circumstances.
24 Q. So that's the time you testified about
25 earlier?

1 age of 30?
2 Q. That were providing massages to Jeffrey
3 Epstein?
4 A. Just the male that was teaching me on the
5 USVI and Sheridan, but she was also involved in sexual
6 acts. She wasn't over the age of -- she could have been
7 around 30, but she would have been over 30.
8 Q. Did you keep a list of the masseuses who
9 came to Epstein's properties?
10 A. No.
11 Q. Did some of them come only once?
12 A. Uh-huh.
13 Q. Are there some that came when you weren't
14 there?
15 A. I wasn't there, how am I to know.
16 Q. You don't know if any came as a masseuse
17 while you were not at Jeffrey Epstein's property?
18 MS. MCCAWLEY: Objection, asked and
19 answered.
20 A. I wasn't there so I couldn't have.
21 Q. What's the sixth incident that you say
22 happened where you were sexually trafficked to Professor
23 Dershowitz?
24 A. We've talked about New York, we talked
25 about Palm Beach, New Mexico, U.S. Virgin Islands, talked

1 about we took the airplane?
2 Q. Yes.
3 A. There was an instance in a car, but it was
4 more -- it wasn't intercourse, it was more --
5 MS. MCCAWLEY: Use a term you're
6 comfortable with.
7 A. More oral is the good term to use, oral
8 sex.
9 Q. Where were you? Where was his car, what
10 city, what state, what jurisdiction? Where were you?
11 A. This was in Massachusetts. It was a black
12 limousine.
13 Q. Who else was in the car other than yourself
14 and Professor Dershowitz?
15 A. Jeffrey Epstein and another young girl.
16 Q. How many people participated in the sexual
17 activity in the car?
18 A. Including myself?
19 Q. Uh-huh.
20 A. Four.
21 Q. Where was everybody in the car?
22 A. Sitting down.
23 Q. Were people -- was this a town car, was
24 this a limousine?
25 A. Like a long limousine.

1 Q. Where was the car going?
2 A. To Mr. Dershowitz' house.
3 Q. Where was it coming from?
4 A. An airport.
5 Q. When was this?
6 A. I don't know.
7 Q. What's your best recollection?
8 A. It wasn't snowing. It wasn't hot. So I
9 would like to say -- I'm trying to think of the trees
10 around, but I don't know, maybe spring.
11 Q. Why were you going to Professor Dershowitz'
12 house?
13 A. Jeffrey and him were doing some business.
14 They were doing something at his house. Nothing sexual
15 happened at his house.
16 Q. Did you go in Professor Dershowitz' house?
17 A. Yes, I did.
18 Q. How long were you there?
19 A. Not even twenty minutes, half an hour.
20 Q. What did you do while you were in the
21 house?
22 A. I sat in, I don't know, a foyer with
23 another girl and Jeffrey and Dershowitz went to a
24 different part of the house. There was a desk there and
25 we just sat, not sat, stood in the foyer.

1 Q. Who was this other girl?
2 A. I don't know who she is.
3 Q. Had you ever met her before?
4 A. No.
5 Q. When you were coming from the airport had
6 you flown in?
7 A. Yes, me and Jeffrey and the girl had flown
8 in, Dershowitz had not.
9 Q. How did he get into the limousine?
10 MS. MCCAWLEY: Objection.
11 SPECIAL MASTER: You can answer.
12 BY MS. BORJA:
13 Q. Where did he get into the limousine?
14 A. At the airport.
15 Q. He was not on a flight with Mr. Epstein?
16 A. Not on this occasion.
17 Q. Did you tell anybody about this incident in
18 the car?
19 A. Like anybody that I know personally?
20 Q. Anybody in the world?
21 MS. MCCAWLEY: Objection to the extent you
22 relayed something to your lawyer. You can say
23 that you told your lawyers but you can't discuss
24 what you said.
25 SPECIAL MASTER: Other than --

1 A. No, I told my lawyers.
2 Q. Did you tell anybody about it closer in
3 time to the event?
4 A. Like my boyfriend or something like that,
5 no.
6 Q. After you left Professor Dershowitz's house
7 where did you go?
8 A. Back to the airport.
9 Q. Where did you fly in from?
10 A. I believe it was New York.
11 Q. When you went back to the airport where did
12 you go?
13 A. I believe, see, that's the hard thing. I
14 want to say either New York or Palm Beach. I'm no 100
15 percent sure.
16 Q. So I understand the time frame, did you fly
17 in on a private jet or commercial?
18 A. Private.
19 Q. You flew out again on private?
20 A. Yes.
21 Q. So the time frame is that you and Jeffrey
22 were on the plane?
23 MS. MCCAWLEY: Objection.
24 A. Yes.
25 MS. MCCAWLEY: Objection, mischaracterizes

1 the testimony. Go ahead.
2 A. Yes, me and Jeffrey were on the plane
3 together.
4 Q. And the girl was on the plane?
5 A. Yes.
6 Q. Anybody else?
7 A. The pilots.
8 Q. So the three of you took the flight,
9 correct?
10 A. Yes.
11 Q. And you flew into an airport in
12 Massachusetts?
13 A. Yes.
14 Q. Then you took a limousine to the
15 Professor's house and you were there for about ten
16 minutes, is that right?
17 MS. MCCAWLEY: Objection. Go ahead.
18 A. About 20, 25 minutes. I didn't look at my
19 watch.
20 Q. A very brief period of time?
21 A. Very brief.
22 Q. And then you went back to the airport and
23 you flew out?
24 A. Yes.
25 Q. And you flew back either to New York or to

1 A. Besides what's in these?
2 Q. Did you ever look to see if you had any
3 personal notes in your writing that pertain to Professor
4 Dershowitz?
5 A. Like from my old journal, the one that I
6 burned?
7 Q. From anywhere. Did you ever make an effort
8 to look?
9 A. Dershowitz could have been in my journal,
10 he could have been. We're talking about an 85 page, if
11 not more, you know, things that I had written to get my
12 story out of my head and into pages; and yes, Dershowitz
13 could have been in there, but that's up in the clouds
14 now, bonfire.
15 Q. That's what you call your journals, what
16 you burned, right?
17 A. Yes.
18 Q. And you wrote that journal in order to
19 collect your thoughts?
20 A. To get everything out of here and on to
21 paper.
22 Q. Have you made any other notes, though,
23 since then to help you when you think of things?
24 A. Yes, sometimes like I said, sometimes when
25 I read my affidavits and stuff like that, you know, and I

1 think of something else like a description of something
2 that I forget about, you know what I mean, then yeah,
3 I'll go back and I'll write it in the journal, you know,
4 for instance, you know, what another girl would have
5 looked like. Even though I can't identify her name or
6 her age or anything like that, but I do remember like
7 flashes of blonde, little things like that, but nothing
8 -- I don't have any more journals.
9 Q. But those notes, they help your memory?
10 A. Sometimes. I'm a very visual person.
11 Q. And they help you with your affidavits?
12 A. No, they don't help me with my affidavits,
13 my affidavits are already done, I just go back and it
14 helps my memory. It helps me bring stuff out.
15 Q. What do you do with those notes?
16 A. Nothing, literally nothing. They're in a
17 notebook that if I need to write it down. I have a dream
18 notebook as well where I'll just write down my dreams and
19 stuff. I do nothing, no one is seeing it.
20 Q. You read it? You keep it?
21 A. Yeah, I keep it.
22 Q. Okay. Have you gone back and read that
23 recently?
24 A. No.
25 Q. Okay. You continue to make entries into

1 it?
2 A. Not so much about Dershowitz. It's mostly
3 like feelings, dreams, you know, past things that I've
4 gone through. Like I said, not so much pertaining to
5 Dershowitz himself.
6 Q. And that's separate from your dream book?
7 A. No, it's all in one.
8 Q. Is it a spiral bound notebook?
9 A. Yes, it's just a cheap, like, actually it's
10 in my kid's closet.
11 Q. At this point in time are you angry with
12 Mr. Epstein?
13 A. Furious.
14 Q. Are you angry with Professor Dershowitz?
15 A. Absolutely.
16 Q. Are you angry with famous politicians?
17 A. I'm angry with anybody who has it in their
18 mind that they can hurt and abuse a minor child and
19 continue to lie about getting away with it and that what
20 they've done is okay and they can continue to harass
21 victims, yes, I'm furious.
22 Q. Are you angry with Professor Dershowitz for
23 his role in representing Jeffrey Epstein in the criminal
24 action?
25 A. Do I think he played a big part getting him

1 C E R T I F I C A T E O F O A T H
2
3
4 STATE OF FLORIDA,
5 COUNTY OF DADE,
6
7 I, Deborah A. Harris, the undersigned
8 authority and Notary Public certify that VIRGINIA ROBERTS
9 GIUFFRE personally appeared before me and was duly sworn
10 on the 16th day of January, 2016.
11
12 Sworn to before me this 20th day of
13 January, 2016.
14
15
16
17
18 ______________________________
Deborah A. Harris, Court Reporter
19 Notary Public - State of Florida
My Commission No. FF 246867
20 My Commission Expires: October 31, 2019
Job No. J0277789
21
22
23
24
25

1 REPORTER'S CERTIFICATE
2
I, Deborah A. Harris, Florida Professional
3 Court Reporter and Notary Public in and for the State of
Florida at Large, do hereby certify that I was authorized
4 to and did report said deposition in stenotype; and that
the foregoing pages 1 through 216 are a true and correct
5 transcription of my shorthand notes of said deposition.

6 I further certify that said deposition was
taken at the time and place hereinabove set forth and
7 that the taking of said deposition was commenced and
completed as hereinabove set out.
8
I further certify that I am not an attorney
9 or counsel of any of the parties, nor am I a relative or
employee of any attorney or counsel of party connected
10 with the action, nor am I financially interested in the
action.
11
The foregoing certification of this
12 transcript does not apply to any reproduction of the same
by any means unless under the direct control and/or
13 direction of the certifying reporter.

14 DATED this 20th day of January, 2016.

15

16 ________________________________
Deborah A. Harris, Court Reporter
17 Job No. J0277789

18

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EXHIBIT JJ

BOIES, SCHILLER & FLEXNER LLP

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CONFIDENTIAL/SEALED DEPOSITION
SPECIAL TREATMENT REQUIRED

Sigrid S. McCawley, Esq.
E-mail: smccawley@bsfllp.com

February 10, 2016

VIA E-MAIL & FEDERAL EXPRESS

Esquire Solutions
PRODUCTION DEPARTMENT
101 Marietta Street
Atlanta, Georgia 30303
errata@esquiresolutions.com

Re: Confidential/Sealed Deposition Transcript, Job No. J02777789 (Errata changes to be treated in same manner).

To Whom It May Concern:

Attached please find the errata changes for the Videotaped Deposition of Virginia Roberts Giuffre taken January 16, 2016. This transcript has been designated as Confidential and has been sealed by the Court. Please ensure that all materials including transcript, errata changes and video tape are treated accordingly.

If you have any questions regarding the errata changes or treatment of confidential/sealed materials, please do not hesitate to contact me at (954) 356-0011.

Sincerely,

Sigrid S. McCawley

SSM:sp
Enclosures

1 DEPOSITION ERRATA SHEET
2
3 Assignment no: J0277789
4 Bradley J. Edwards and Paul G. Cassell
5 vs.
6 Alan M. Dershowitz
7 **
8 DECLARATION UNDER PENALTY OF PERJURY
9
10 I declare under penalty of perjury that I
11 have read the entire transcript of my videotaped
12 deposition taken in the captioned matter or the same has
13 been read to me, and the same is true and accurate, save
14 and except for changes and/or corrections, if any, as
15 indicated by me on the DEPOSITION ERRATA SHEET hereof,
16 with the understanding that I offer these changes as if
17 still under oath.
18
19 Signed on the 11 day of February
20 2016.
21
22
23 ______________________________
24 VIRGINIA ROBERTS GIUFFRE
25

Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789

DEPOSITION ERRATA SHEET

Page No. 6 Line No. 17

Change to: **"Yes. I signed the subpoena duces tecum."**

Reason for change: Did not initially recognize the document

Page No. 6 Line No. 20

Change to: **"No. My lawyers worked with me to collect documents and my understanding is that we turned those documents over to Dershowitz's counsel prior to the deposition."**

Reason for change: Clarification of answer

Page No. 9 Line No. 9

Change to: **"Yes."**

Reason for change: Did not initially recognize the document

Page No. 11 Line No. 1

Change to: **"Yes."**

Reason for change: Misunderstood the question

Page 11 Line Nos. 4-5

Change to: **"I'm confused. I don't know what foreign president you're talking about."**

Reason for change: Misunderstood the question

Page No. 11 Line No. 23

Change to: **"I understand well-known prime ministers and other world leaders; as far as foreign presidents, I believe so."**

Reason for change: Misunderstood the question

Page No. 12 Line No. 2

Change to: **"Yes, assuming South America is considered overseas."**

Reason for change: Misunderstood the question

Page No. 12 Line No. 8

Change to: **"As far as I know right now, yes, I was."**

Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789

Reason for change: Misunderstood the question

Page No. 38 Line No. 11

Change to: **"I'll continue with the list here. Nadia Marcinkova I was not sent to her, but she was part of it with Jeff Epstein. Others on the list include Marvin Minsky and Tom Pritzker."**

Reason for change: Clarification of answer

Page 38 Line 19

Change to: **"Off the top of my head, once, but it could have been more."**

Reason for change: Clarification of answer

Page No. 38 Line No. 21

Change to: **"I believe Tom was at Mexico. I may have also been with him in other places."**

Reason for change: Clarification of answer

Page No. 41 Line No. 8

Change to: **"On an airplane and in a limo."**

Reason for change: Clarification of answer

Page No. 41 Line No. 10

Change to: **"One, each time."**

Reason for change: Clarification of answer

Page No. 41 Line No. 12

Change to: **"On airplane, blond, young."**

Reason for change: Clarification of answer

Page No. 98 Line No. 16

Change to: **"As you can see in that answer I'm not even sure. It wasn't six months, but between six months and a year which is why I'm saying nine months. It was an assumption. It could have been six weeks."**

Reason for change: Clarification of answer

Confidential/Sealed Transcript Pursuant to Court Order
Videotaped Deposition of Virginia Roberts Giuffre (January 16, 2016)
Job No. J0277789

Page No. 190 Line No. 22

Change to: **"No, other than maybe you showing it to me today. It's in my pile. It's not in my pile, is it? I don't know. I haven't seen it. I was served with the subpoena, and I signed for it, and I reviewed it at that time."**

Reason for change: Clarification of answer

Page 191 Line 5

Change to: **"Why would I do – no. I did collect documents and gave them to my lawyers in response to this subpoena. And my understanding is those documents were produced."**

Reason for change: Misunderstood the question

Page 191 Line 20

Change to: **"Yes, but I did not have any pictures of myself with Professor Dershowitz."**

Reason for change: Misunderstood the question

EXHIBIT KK

The Billionaire's Playboy Club

By Virginia Roberts

To my true love Robbie who believes in me every step of the way and to all of my children, you are all my very inspirations!

Chapter1

Every single person in this shared world together has a unique story of his or her own to tell, this one is mine.

It was coming up to my third night camping out at Miami Beach in the summer of 1997. I was thirteen years old and hiding from a world full of hurt. Sitting on the shoreline for hours watching the sunset fall deeper into the horizon, my eyes were glazed over with tears, not from being wind-whipped by the rough sea breeze, but from reflecting on the abuse I encountered as a young girl and how everyone in my life who was supposed to be there for me had now turned their backs on me in abandonment. My fears crept up and the excitement of escaping all of them faded now realizing how alone I really was now, and for the hunger that was paining my belly. At this point, with nowhere to go and only time to waste, I wiped the tears from my eyes and set out to find an empathetic person that I could manage to get dinner money from. If not, it wouldn't have been the first time I had gone hungry for the night. I walked to the nearest bus stop and asked a handful of people for any spare change, none of whom that could help me. Sitting down on a nearby curb disappointed in grief of my current state, I put my head into my knees and began to sob.

Out of nowhere, it seemed, a black stretch limousine turned the corner and stopped in front of the curb where I had been hopelessly lost. The back door opened to reveal a heavy weight and balding, old man with a big cheesy smile. Neatly dressed in black trousers and a collared shirt, he was sitting next to a striking young, blonde girl, drop dead beautiful and dressed in a foxy red mini dress she looked like a model just stepping off a runway.

Their smiles greeted me warmly and he kindly asked, "What is such a sweet little girl like you doing sitting alone on the street looking so upset?" Shocked from this strangers concern I was hesitant in telling him the truth. Reluctantly I decided to tell him that I was a runaway, not from around here and really hungry. Hoping at most, I would get some money for food from him. He instantly displayed a chilling excitement and offered me to come into his car so we could talk some more. That

should've been my first queue to get out of there quick but with no where to go, and so naïve I didn't realize how much worse it could get. Setting foot into that limo, I made my first entrance into a world that would entrap me for many years to come.

He introduced himself immediately as Ron Eppinger, a businessman and owner of a successful modeling agency, called "Perfect 10". Flaunting his oozing wealth by introducing one of his many girlfriends, the beauty next to him was Yana, a supposed model from the Czech Republic who looked like she could be in her early twenties with the heavy load of makeup she was wearing, but really was only in her late teens. She kissed me on both cheeks and politely said "Hello" in a thick Czech accent, making me feel a little more at ease. Convinced it couldn't be that bad there was another girl in the car, right? I couldn't be more wrong.

What he didn't tell me to begin with was that his modeling agency was only posing for an undercover trade. By the time I found out I thought it was too late to run. His business was really an illegal immigrant trafficking ring of young women mostly consisting of underage girls that he was using as escorts to make him uber rich. Only available to a selective clientele costing them anywhere from $1000.00 and over per hour of erotic entertainment, the girls were trained to fulfill every sexual desire asked of them, no matter how bizarre the requests might be. The high paid escorts, for Ron's super rich clientele, such as Yana and many other charismatic beauties would only benefit a fraction of their earnings for themselves, Ron reaping in the majority of the financial rewards and being they were all illegal immigrants they were further trapped by his enslavement.

I proceeded to introduce myself, besides what he had found out about me on the curbside. Telling him my name and a little about how I ended up on the streets explaining that I could take care of myself and didn't need my family or anyone to look after me anymore. Looking back later in life I can now admit I was in a terrible state, but being such a headstrong teenager, I refused to give in. He asked my age and I told him I was sixteen at first. He coyly replied, "Are you sure? I think you could be telling me a fib? How old are you… really? I wont be mad" Being a terrible liar, I knew had been caught out and couldn't deny it any further. I told him the truth and he chuckled then paused and answered in a very serious tone " As long as you never lie to me again I will take you in" Right away I pondered to myself what did he mean…take me in?

He gave the driver the location of our destination and rolled the middle window back up to then tell me a story of how his daughter had passed away seven years ago from a horrific car accident in which four other teens were killed and he has never gotten over it. I reacted with sheer

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of life was just mind blowing to even comprehend at first. With such a new outlook of the world to try and grasp at my young age I was listening to every word spoken to me with such attentiveness, I was going to try and model what I was observing from the girls. I justified their way of thinking in my head for now, thinking if all these girls seem happy enough, why couldn't I try to be, it was this or the streets for me.

Ron came back for me not long after our conversation got out of hand and took me to a bathroom down the hall. He opened the tap and filled a small plastic cup with water and handed me two small blue oval pills. Telling me to take them both as they would help me to relax a little bit more. I swallowed the pills just following his orders. I put the cup on the counter top and turned back around to face him. Backing me up against the wall and now cornered by this large man I felt his slithering hands began to creep under my shirt, writhing my skin. I closed my eyes tightly and turned my head away from him, hoping he would take my actions as a sign of being extremely uncomfortable but that wouldn't bother him at all. He was half enjoying my reaction from the smug look on his face, and persisted through it.

Continuing to undress my clothes he said he wanted to look me over and clean me up. It was so humiliating having to expose myself to this ageing man and now I knew he was going to end up with his hands and whatever else all over me. All too soon I hated to be right, as I stood naked before his widened eyes, he told me "you're a hairy bugger I'll have to shave you right up young lady", and I didn't know he wasn't just talking about my legs. Standing with my legs wide apart while this man coaxed me through the entire ordeal of shaving, his hands made me feel so dirty. "Have I lost my mind?" I thought to myself but I had to play nice until I had an opportunity to get away, this was not as fun as the girls made it out to be after all, this was utterly disgusting. I had no idea what was going to happen next with this guy, and due to whatever pharmaceuticals he gave me, I still don't know to this day.

Waking up the next morning my head was pounding in an agonizing thumping pain and I was so thirsty. The satin sheets thankfully covered my body, which was still nude from the night before, and I could hear hushed voices standing over the bed where I was pretending to still be asleep. Listening in on their conversation I kept my eyes shut. I knew Ron's voice from two of the men but not recognizing the other guys I just stayed quiet hoping they'd soon leave. Ron was telling the other man what atrocities he got up to the night before with me and I heard him say, "Doesn't she even look like an angel the way she sleeps? She's my own little angel!" He exclaimed proudly. I opened my eyes and rolled over to face them both having to wrap the sheets over my body, really not knowing what to say except "Good-morning" in a blushful tone. Ron

introduced me to his business partner and told to go get dressed. He had my whole day planned out for me already. Booked into get my hair colored, a much lighter tint of blonde, and afterwards a day of shopping with the girls I was becoming exactly what he wanted me too, a carbon copy of the teenage Barbie… only I wasn't plastic and came with many benefits.

Days turned into weeks, being a servant to the sexual desires of this distorted pervert. I dreamt of escaping but where would I go and how would I get away from Ron with him controlling my every second of my day. Separating myself from the other girls being so uncomfortable with enduring the everyday occurrences I was longing for the solitude of the beach again. They were training me up to be an escort prodigy or something like it. Outrageous orgies were conducted as my lessons with the girls teaching me all of their tricks in the game, it was all for the sake of men's perverted fantasies, they didn't get anything from being sexually exploited and molesting each other, except getting paid for it. Everything from oral sex too penetration with toys, I was expected to not only to join in but even perform ludicrous acts of hedonism.

I was Thirteen years old and had never heard the terminology of these sexual acts before, and definitely shouldn't have been learning them first hand. Thrown into a world of chaos, I didn't know what to do except be as compliant as possible, even when asked to do the most degrading tasks. The excitement of the lifestyle he offered quickly diminished once I had to pay so dearly for it. The girls that subdued to this lifestyle and enjoyed it definitely put on a good act, but no little girl with hopes and dreams of their untainted future, turns to her mother and say's "one day I dream of being a prostitute, passed around from man to man, only to grow older regretting so much of my life" It was all a part of an illusion that Ron painted for us that made it seem so alluring in the first place.

Spending my days with Ron, he took advantage at every chance given. Even in his convertible with the top down I would be forced to go topless while he drove around, when I asked him why one day, it was supposedly so I could maintain an even suntan, but I knew it was his way of showing off his treasures. It was a far cry from the simple country life I had been raised in. Wearing designer miniskirts and tops that always revealed too much, of course due to Ron and the girls determining everything I wore, ate, or spoke. We would spend our days at hair laser clinics, shopping, tanning beds, and eating as little as possible. Through the nights we were expected to become party animals and greet Ron's clientele with the upmost flirtatious attention and doting as possible. Then whether we were out for dinner, at a party, or at a club, the men would choose his girl and take her home. Every girl had a different price and so did the charges depending on the various clienteles but Ron always kept me for himself.

sympathy and gave him my pity, believing this man had a heart. His next proposal was eerie, he said," If you wanted, I can be your new Daddy. Someone to take care of you and you'll be my new baby forever" he stroked my hair such as a caring parent would comfort a scared child. A part of me wanted to accept his words and believe he really could feel that way, and then I also considered how hard it was living on the streets. In the end I convinced myself this would be the lesser of two evils.

The car stopped at a plaza on the water, surrounded by little boutique shops, restaurants, and little stalls with items for sale like sunglasses and costume jewelry. I didn't know what to say or do or how to act, it all happened so fast I just went along with everything he said, for now.

We went to a take out restaurant and ate on the waterside, and afterwards he took me to G.A.P Kids co. to dress me in his idea of proper attire, tiny cutoff shorts revealing the cusp of my buttocks and some shirts that barely fit, even the sales assistant was shocked at what she thought was my Grandfathers choice in clothing. I couldn't even believe it myself only an hour ago I was begging for money living on the streets and now I was dining alfresco and shopping at name brand outlets. We then hit a couple of more specialty stores afterwards. He said he had to buy me a few more necessities to start with. Lacy G-strings and what looked to me like lingerie pieces I had only seen grown women wearing in magazine ad's or movies was now a part of my wardrobe, in my mind it was a big step up from being a little girl any longer.

The driver took us back to Ron's grand apartment overlooking the isle of Key Biscayne and a large bridge leading into a Miami Harbor. Entering his residence, I was blown away by the spectacular view, rich décor, and white marble floors that were so glossy it looked as if I was stepping on glass. He took my shopping bags to a large room at the back of the apartment and put them into a small closet. The room was considerably large with glass exterior walls that maximized the potential of the panorama landscape soaking in the seascape of Miami. In the room was a gigantic round bed raised off the floor by three steps and mirrors on the ceiling. It looked like a honeymoon suite out of a raunchy hotel. He then exclaimed, "This is my room here and you will be sharing it with me" When I asked him where I would sleep he then sickly replied "With me silly, where else of course?" With no room for argument I pretended to be O.K with everything that my common sense was screaming out in my head to run.

Next I was taken down a long hall at the other end of the apartment to meet five more exotic beauties. Three girls were in their late teens and the other two in were in their early twenties. All of them were from the Czech, here under false passports provided by Ron and his contacts. Yana held my hand while introducing me to the group of girls as "Baby" a pet

name she came up with for me, being I was the youngest one among them or ever to be brought in by Ron for that matter. It became my new identity not even worrying to mention my real name to anyone anymore. My identity was no longer important to myself, I wanted to become someone new and "Baby" is who I was.

A shocking first impression, the girls were completely nude revealing their voluptuous young bodies with such a careless ease and others were in just a G-string, similar to the one's Ron had bought me earlier. They were all stunning girls and full of life. Charismatic and beautiful, they were the girls who should be on the front of billboards not selling their bodies to old crewed men for sex. Doing each other's make-up in front of the mirror and chatting away on the bed with no care in the world, aiming at persuading me to see the highlights of the life Ron gave them and they almost did. Ron left the room for a few moments, letting us all get to know each other a little better and that's when I started to compile an understanding of what really went on here.

Just catching a bit of their conversation from before my introduction, I heard them chatting about the night they were preparing for. Speaking excitedly about some men they would be entertaining in a few hours, one girl was talking about going out to sea with one o these clients on a yacht for a few days. Since none of the girls seemed shy to talk about their professions or anything for that matter, I decided to ask them a few questions about what they did. They were more than happy to expand on their point of view in the conversation, attempting to paint a pretty picture of what they were paid to do.

They all began to jump up and down with excitement like giddy school girls at a slumber party. Another girl with jet-black hair and a thick accent, wearing absolutely nothing at all, grabbed me onto the bed with them and into their fiasco, instantly making me feel accepted into their sorority, like I actually belonged somewhere for once. Yana went on to explain a little more in detail, " We accompany the wealthy friends of Ron. They want only beautiful girls by their side so we come and act however they want us too but most importantly we make them think we want them back too." Other girls began to jump in with their vivid points of view while playing with my hair, they were taking turns brushing and styling it as they were filling my head with all of the prospects I could have as an escort too. They made me feel beautiful like them, too beautiful for what a girl beyond my years should feel. I was simply being lured into a dangerous trap, just like they had been at a young age too.

It pretty much all came down to two things in their game, the money they would make and the lifestyle they were given. Their enthusiasm only interested me further, making it not only sound like an acceptable way of living but also appearing to keep them all vivaciously satisfied. This way

I would always dread the end of every night, fearing what new desires he had in-store for the evening. Sometimes he would hurt me and tell me to try and enjoy it then do it over and over again until I gave him exactly what he wanted, I always resisted until I could no more, he was too overpowering and relentless at getting the results he wanted. At other times he could be so gentle and caress my skin, worshiping every inch of my body, all relying upon on what mood he was in. Often though he liked to play the teacher role and instruct me on every motion and explain what would happen when I did those certain things to him. No matter what he did to me I was only disgusted with myself more and more. I still shudder at the thought of how he used my body.

I turned fourteen in August that same year and was spending my birthday loaded on a concoction of pharmaceuticals and alcohol, being generously supplied by the very man who swore his devotion to caring for my every need. I didn't even know myself any longer, completely shying away from the girl I had grown up to be until to this point. The apartment was empty except for me, for the time being, and that was God's own little present for me…some solitude for once I thought. Pouring myself another drink I opened the sliding glass doors to the balcony and walked to the edge. Looking down from the many stories where Ron's apartment was, I wished myself a happy birthday out loud and wondered if my family even remembered the day's occurrence.

Dwelling in my sadness for the fourteen years of suffering and loneliness I had already endured, the tears swelled up in my eyes, trickling downwards making my eyeliner inevitably leak down my cheeks. Inside I felt so trapped and began to entertain the thought of jumping over the edge, it all seemed much easier, and the simple blackness that death had to offer rather than the tangled mess I was so tired of fighting to get out of seemed a much easier approach. Detached from wanting to feel anything, I became so numb towards my life's own tragedies. I couldn't live like this any longer. I lifted my bare legs over the edge of the railing and sat looking at the ground beneath me so close to even just slipping off the edge to my very death. I couldn't think of any reason not to fall. I thought I had made too many bad decisions to keep going on but some force of a higher nature had other things in store for me.

The sliding door slammed open with a burst of speed and Ron scooped me up in his big arms and brought me inside to our bedroom. Laying me down and seeing the look of despair in my eyes from my tear stained face he went into the bathroom cupboard and returned with three pink pills. Forcing me to swallow them using the angered tone of his voice he thought he was turning my sorrows into a distant dream as I passed out in

his tight clutches, crying myself all the way to sleep. He didn't even ask me what was wrong, probably because he knew already.

Soon enough the crumbling of his evil empire in the underworld of selling sex for his own advantage began with a single crack in his perfect scheme, and proudly it all started with me. Ron got a scare one-day and rampaged through his apartment telling us girls to only pack our important belongings and some clothes as we all had to leave right away. I didn't have much belonging to me so I basically sat there watching everyone rush around frantically and was curious what could've gotten a man like Ron so scarred. Once we were packed up and in the limo he was trying to calm the frantic girls down after all the panic that spread through the apartment like wildfire, I was the only one sitting there half amused at the entire situation.

He began by assuring us that everything was going to be fine. Calmly he continued to tell all of us packed in tightly, even for a limo, that we were all taking a long trip to Florida's countryside because someone has reported an anonymous tip to the missing persons unit at the local police station identifying a very young girl as a possible victim of abuse living at his apartment. Ron knew what a landmine of trouble he had brought upon himself making an exhibition out of me on the streets of Miami, I didn't pull off the older look like the other girls, I actually looked younger than my age with my blue eyes and freckles always giving the impression of my youthful innocence.

Now he just had to do whatever it took to ensure he stayed as far away from the authorities as possible. Arriving at a ranch in central Florida many hours later and I assumed it belonged to Ron knowing never to ask him things like that. I knew my purpose and it wasn't prying into his personal life outside of the bedroom. There was a main house, a few cottages, some staff quarters and paddocks where the horses were kept. I was in heaven…I thought at first. Finally, something I could really enjoy. Riding was my passion, basically growing up on the backs of horses since I was just able to walk.

Not surprisingly I began to despise Ron and all of the girls for the gross exploits they made me do with them. Beginning to isolate myself from everyone I'd rather spend my time sitting under a tree watching the horses graze, writing in my journal or painting but mostly avoiding everyone possible unless Ron required me elsewhere. Nighttime was always a reoccurring nightmare for me. Relived over and over again in many various ways. Ron would always start by making me some drinks and offering an assortment of pills before indulging himself by grotesquely putting his genitals in my mouth and tell me how to give him what he would call a "first-class blow-job", and I was being judged every minute of it. Ordering me to slowdown or speedup or maintain a perfect

rhythm I was constantly being criticized for my efforts in pleasing him. I was eager when he actually gave me a compliment. The rest of the evening was always a surprise left up to a moments notice. Quite regularly he would proceed with having the girls dress me up in some sexy outfit and loads of makeup then entertain him with a lesbian reenactment revolving him in the center. Sometimes they would use dildos and other foreign sex toys, Ron liked to see us hurt during sex, sometimes even penetrating me anally but I always resisted and would try to redirect him with another sexual desire of his but I had no excuses when it came to me having to use the sex toys on him, he told me how men have g-spots in their rectum and instructed me on how to precisely penetrate him. These nights went on what seemed like an eternal sentence for the price of not living on the streets, where unfortunately for the one's still there, I feared and knew from my own personal experience, could be much worse.

Needing some contact with someone of my adolescent mentality I called one of my school friends from the past, whom I wont name out of privacy, but I'll call him T.J. We were so close and I knew very well, so well, I had memorized his number a long time before. He was my first puppy love sprung from of a childhood friendship. Being my very first crush the summer before all of this happened he was the only person I could think of that would care enough to talk to me.

In the middle of the day, the least busy time to be noticed, I snuck into one of the vacant guest rooms and used the phone to call my good friend. The sound of my voice radiated a chill in him. "It's you, oh my God Jenna! Are you okay?" he was so shocked to hear from me and the sheer fact I was still alive. Nearly three months now without a single word to my family or friends, every one doubted my return. My attempt to forge a happy voice when I spoke to him failed and I absolutely crumbled when he was at a loss for kind words for me. I told him of my current state of affairs. Telling him of Ron and how I was terrified of him, trying to escape in the middle of nowhere was useless. It was like being kept in cage that I was unable to break free from. Going on to dump my issues on T.J, I proceeded with how I longed to call my family and to be with my them for good but was too afraid they didn't want me, knowing I'd just be sent away somewhere else again and to me after all this time was like going from one cage to another.

He had been called by them numerously and promised me that they were very worried and even hired private investigators to try and find me. Given I was eleven years old the first time I was sent away, my trust in there sincerity he spoke about was seriously doubted. I kept the conversation short just in case my absence was being noticed and I left on the note that I would speak to him again shortly. His attempts to get off

the phone were nothing short of desperate plea to keep me on as long as possible. I thought he was just trying to help in someway. Giving him assurance in the fact I had survived this long obviously I can hold off a while longer I gave him my love and told him I'd be in touch.

Thinking I had slipped away unnoticed I entered into the room that I shared with Ron, hoping I got away with my brief and very needed phone call. The place looked empty and everyone else seemed to be out and about so I decided to have a bath in the spa and try to relax before the night's precautions. My body glided into the steamy water as I began to think about T.J and how good it felt just to hear from a friendly voice. My thoughts drifted into the days I missed when I felt I could be silly and childlike and I nearly forgot for a moment how grown up I was acting these days.

My first glimpse at the image surrounding me when I resurfaced above the water was daunting. There was Ron was standing over my tub, looking down at me with an eager display of his arousal. He began to undo his pants and take them down when he told me "put your lips on my cock", I was too slow in responding to his request so he grabbed me by the back of the head and forced me into his groin. I had tears streaming down my face as I looked up to him with the saddest blue eyes hoping he would take pity and stop, but he never did. I was really hurt by his aggression and he definitely knew it this time, which I believe only made him more heated. I closed my eyes and began to count using the time to keep my thoughts elsewhere believing every number I counted only furthered me to the end of this. I just got over a hundred when he finally exploded in fulfillment still half submerged in the deep bath I was struggling to gain my bearings in as Ron was picked me up out of the bath and carried me to go to the bedroom, which was just outside the French adjoin doors. Still damp from the hot water in the spa I had goose bumps from the chill of the fresh air where he brought me to the bed and proceeded to deeply violate my every being. Eventually his scars that he left were too deep ever to be healed and would even carry on through the years to come.

Upon his bursting with pleasure for the second time, he just got up and left, without even saying a word to me. Left alone I was awake for hours after that. There was no escaping the pain that night. I lay naked wrapped in the sheets, sobbing in the dark. My feelings of being hurt and disgusted after his abusive ordeal "When will it ever stop" I prayed to God and begged for death rather than face another day in my life. I woke up still alone the next day and exasperated from the misery I felt the night before. Ushering through my drawers to find something to throw on I could care less what lay in store for me today, couldn't be as bad as being raped by a scary man repeatedly.

Starting my day with a few of the supplied oxytocin's and a bloody mary, made by the live-in house chef. Having two celery sticks for my breakfast, I wanted to lye out by the pool and forget the world. Ron hated tan-lines so to be caught with a bikini top on was a big no-no in his rule book but after my cries to stop were so blatantly ignored last night, I was out to piss him off so I didn't remove my shirt. I put on my headphones and before I knew it had fallen into a deep slumber from my self-made therapeutic cocktail, the only way I knew how to cope with the emotional turmoil on the inside.

Desperate to hear his voice I called my friend T.J a few more times that week. I needed to feel like someone out there really knew me. Sometimes we could just chat like old friends with no care in the world and laugh at a distant memory from too long ago. Then would come the good-bye part of the conversation and we would both get teary-eyed not knowing what could happen next or if this would even be the last time we ever spoke to each other again.

My biggest fear came to reality when I was in our bedroom one afternoon, just lounging around out of boredom. Ron came bursting in through the door, red as a tomato. I couldn't help but feeling I was in big trouble. His face was distorted and raging towards me. I knew right away he must have found out that I was calling T.J, but how, I had no idea. I had always tried to be as invisible as possible, soon enough it was all explained.

"Are you trying to get me caught? You are nothing but a stupid girl you know that! What am I supposed to do with you now?" He was tearing up the room while his rants gave me something else to think about. What would he do with me if he had no use for me any longer? I wasn't even thinking about him being caught for soliciting illegal immigrants for the purpose of prostitution. I was more worried that he would be upset at the fact I was talking to another guy, maybe even jealous that he was at least my age. I replied with simple sentences that I could manage to get out between all the shouting. I kept saying, "I'm sorry" and putting my head down in shame. He picked me up by my throat pinning me against the wall, "You are going away, far -far away from me and you better be nicer to the next man I send you to, I've heard he's not a nice as most would like. Are you fucking hearing me Bitch?" I slid down the wall, choking on the first air entering my lungs, breathless and terrified, I never thought Ron was a nice guy but I had never seen him lose it this bad. Now I was being sent me away to another stranger, another man, it only terrified me more.

The girls came in to say their good-byes all of them were crying and asking me in their best English languages, why I had to call someone and lose everything? I was able to find out through the broken sobs off of

them that the confession came from the house-keeper who said she saw me use the room regularly but was never messed up, so Ron looked at the recent telephone bills and found the same number dialed from that room consecutively, he knew it was me right away. At least he didn't know it was another guy, I thought to myself, or I probably wouldn't have made it out of there alive.

Ron came back to usher the girls out of my room and told me I had five minutes to pack my clothes, which he made clear were to be my only belongings to take with me. He washed his hands clean of me that night, or so he thought. The driver came knocking at my door, just as Ron said, no longer than the five minutes that he had offered me and he took my single bag to the car. I didn't want all the jewelry, music or books that he so caringly bought me as tokens of his twisted affection. Only taking my clothes and a wad of hundred dollar bills I had been saving, I slit a hole in my scrunchie inserting my cash for a rainy day that I was more than sure was just around the corner. .

We drove for hours, until I started seeing familiar surroundings. I couldn't believe my own eyes. I was back in Miami, but not on the beaches, somewhere in the CBD this time. The Driver delivered me to the front door with my one bag and waited at the door with me. Now I knew how it felt to be a puppy picked from her litter as you can only hope your next owner would treat you with some sort of kindness.

Another balding man answered the door but he wasn't so grotesquely fat like Ron, but still a new owner at that. He looked me up and down and seemed amused as he snickered to himself. With one last look to the driver over my shoulder it was almost an appeal to him for some way to help me. I knew he couldn't anyways, I was just hoping. He told me his name was Charlie but didn't even bother in asking me for mine. I was sure Ron already filled in all of my details when he arranged this.

Charlie picked up my bag and led me into his bachelor pad townhouse. I was never given a welcoming tour of my new residence or made to feel comfortable. He walked me up the stairs and opened one of the doors in the small hallway. Telling me this would be my room, he showed me into it and told me to wait, he would be back shortly. I sat on my bed afraid to touch anything and after the warning Ron gave me I knew I had to watch my step around here. I put my head down onto the pillows my where world was falling apart and let my emotions downpour. Exhausted from the days emotional turmoil I ended up falling asleep. I don't even know if he ever came in at all that night.

The next morning I looked out of the window to see my new surroundings. It was a beautiful sunny day outside, unlike the dreary cell I was locked away inside of. Feeling the sun warm up my face through the glass, it radiated a familiar sense of comfort from the days of the good

parts of my childhood. I reminisced how it had used to be before all my life turned upside down. Before all of the fights with my family, before I had to look after myself, and before I was a slave to men.

Those days were too long gone now. With too many hard times passing me by it seemed surreal to think that life had ever even existed in the first place. With that thought I shook myself out of reminiscing that way. Whatever was going to happen was out of my control now, I just had to give myself some hope that I would have the strength to get myself out these circumstances before anything really bad happened.

Chapter 2

The house was quiet so I just assumed Charlie was still asleep. I decided to get cleaned up and have a shower. Not even a knock on the door when Charlie walked in with ease. "Typical" I thought. It was an easy way for Charlie to break the ice. "You really are as beautiful as Ron said" as he opened the curtain. Watching me rinse myself in the shower and me knowing I had no way out of this except to go along with whatever he wanted. I just looked down at the mention of Ron's name, wondering what else he had told Charlie about me. Realizing later that he wouldn't have said anything anyways, in fear I would've been a damaged product that wouldn't make him the money that young girls go for.

He just sat on the side of the vanity top and continued to take observations of me standing submerged under the falling water. I avoided looking at him and let him do all the talking, after all I knew what I had to say was of no importance, that is if he was anything like Ron. Between the water beating down over my head I could slightly hear him ramble on about some club and restaurant he owned in FT. Lauderdale. He said he was going to take me shopping for some club outfits and we would party together tonight, as if I was supposed to be excited over this so-called treat of his.

I looked up and gave him a quick smile adding a compliant nod and turned my attention to turning off the faucets and quickly grabbing my towel. I was falling so far from who I used to be, shying away from my outgoing personality to a quiet girl that didn't even recognize herself in the mirror anymore. I dried myself off and looked at the man standing between the doorway and me. He was still watching me with a sleazy look on his face but now preceded to move in my direction, arms wide open. He embraced me, running his hands up around my youthful curves, licking my neck and earlobes. Then his large, rough hands cupped my small breasts and continued downwards to feel in between my legs. I

knew what I had to do to get this over and done with as quick as possible, but I was dreading this moment from the second he greeted me at the door last night.

I fell to my knees and gave into his demented perversions. Thankfully it didn't last long before he climaxed and I was allowed to get myself dressed and ready to go out. I was nothing but money well spent in his mind. This was another extremely wealthy man with a completely new set of wants and needs asking a fourteen year old girl to affectionately dote on sexual desires to a man in his mid forties. I really hated myself, these men, and just about everything my life had boiled up to by this point, but I knew from a young age that to survive in this harsh world I would have to do many things I would not willingly choose to.

At the shops he decided he would choose the clothes he paid for, which I might as well have been declared a teenage prostitute. Just like Ron he also liked it that way. The more degrading he was to me only proved his ownership of my body. He bought me tiny cocktail dresses, and skimpy outfits, which I thought closely, resembled the lingerie he'd also bought for me to wear for him. I noticed that day that he enjoyed parading me around the shopping mall and out for lunch at hooters, even joking with the waitress that he'd like to buy her uniform because he thought it'd look sexy on his new girlfriend.

We arrived at his two in one, Restaurant and Club, at around nine o'clock in the evening. It was a revolving tower called "Hot Chocolates" in downtown Ft. Lauderdale. The food was delicious and for the first time since being with Ron, I ordered a hefty meal with steak and mashed potatoes with a scrumptious gravy smothered on top. Charlie ordered strong cocktails for us both and before I knew it my head was spinning and we were on the dance floor together. The music blared in my head and the rhythm of my body took over, completely forgetting about even dancing with Charlie and letting the music take ahold and work it's magic.

It didn't do me any justice though as Charlie watched me imagining what pleasures lay in store for him later on. Taking me home before the club had even closed, he just couldn't wait to indulge on exactly what he was fantasizing from beforehand. Once back at his townhouse he led me up the stairs into his bedroom and pushed me down in the middle of his bed. The motions from the wavy mattress made me dizzy and feel even drunker when he lay on top of me. Coming at me like a hungered beast wanting to ravage his next meal, it was intimidating as he entered into me with a forceful thrust, he moaned out in delectable heaves. I looked away while he self indulged his own gratifying needs using my body as his instrument in pleasure. I only grew stronger in my head letting the hatred for men desires intensify.

The next two weeks I was expected to be at Charlie's beckon call, never aloud to leave his side, even making me sleep in his bed from the second night onwards. I never even got the chance to call T.J again. It was too much of a risk anyways. Thus pushing him further out of my memory, too afraid, of the emotional repercussions.

Our typical routine was to wake up get showered and dressed and I would put on my make-up while Charlie made his business calls for the day. We would leave the house mid-afternoon and run his errands do some shopping, sometimes meeting his friends or business partners for lunch, none of the men he introduced me to seemed offended at his choice of adolescent eye candy. They'd just continue to chat away as if it was normal to be in public with his arms draped over a girl young enough to be his granddaughter, not too shy by giving me a flirty tap on my bottom or even try to kiss me.

My last night was no different from every other night. We went shopping that day and out for lunch alone. Later we headed to a club his friend just launched and it was his grand opening that night. The club was called "Iguana Joe's". We met up with his friend and said our hellos. They both seemed so excited about the club and Charlie was full of compliments all around. The club did have a line out the door which looked a mile long coming in, luckily we didn't have to use the front door. Charlie returned from the bar with two giant long-island iced teas, which were his favorite drink to start with and then we just sat for a while watching people dancing. Occasionally conversing about passing thoughts. We danced for a while having a few more drinks and after about two hours, Charlie said he was ready to go home. What a daunting time to look forward to, he always liked to have a brief sexual encounter before drifting off to sleep with my naked body intertwined between his arms and legs.

It was bad enough to have to entertain him at every given second of the day but his grip on me was so stifling I felt so chocked I could hardly breathe much less sleep. Eventually my over-worked mind would drift in-and-out of a restless sleep, but constantly on edge. I thought many of nights of escaping, but where would I go? Would one of Ron's ever-so-connected informants finds me and turns me into him to be disposed of for good? I just prayed that I wouldn't be another missing person to add to the list of girls found in the local ditches. I knew that's where I was headed if I screwed this up for Ron again.

As if my guardian angel was there the whole time listening to my secret prayers, my rescue came the next morning with an abrupt bursting through the bedroom door at about six am. Charlie and I were still lying in bed together and his grip on me was still tight. The men dressed in all black military gear had large guns and helmets on. It was so frightening

at first. I couldn't even comprehend what was happening so rapidly. I thought Charlie could've been in some kind of trouble with a business friend he had done wrong too, but then one of the men in black shouted "F.B.I this is a raid get down with your hands on you head", in too much shock to move three of the men grabbed Charlie and threw him to the floor and cuffed him. I sat up in bed with my sheets covering my naked body and watched as they dragged Charlie from the room. Still completely nude he wasn't even aloud to get dressed. Another agent had to come back in to the room to find him a pair of shorts. I could hear him screaming at the top of his lungs all of the way outside He was screaming and the last thing I heard him yell was "If you say anything you know who will find you!" I could hear more threats being yelled at me but I couldn't make out what it was that he was saying. I was in total confusion and couldn't believe what was happening. There were so many uniformed agents I felt so small compared to all of them but they were all very kind and helped me out of bed allowing me to remain covered up with the bed sheets so I could get dressed. The first decency I had been showed in a long time. It was an odd feeling to acknowledge. I knew the life I had come accustomed to for the last six months was now over, and in so many ways I was relieved but was also very nervous about what lay ahead of me.

I excused myself to the bathroom to put some clothes on. Not having anything half decent, like a normal pair of jeans and a t-shirt. The best I could come up with was a metallic blue miniskirt and a tiny matching top that fell just below my breasts, hardly clothing at all it was more like scraps of cloth. Putting my hair up in a tight bun with the scrunchie that held my five hundred dollar bills I was led out of Charlie's townhouse for the very last time. Starting my life over…again, I wanted to leave behind my every memory belonging to these horrid times. Only taking small sack containing my underwear, makeup bag, and journal with me.

The agents led me down the staircase and my last vision's of Charlie was bent over the hood of a police vehicle still screaming and handcuffed. I slipped into the backseat of the car and was driven to Broward County Police Station where the Federal Agents interviewed me about my entire whereabouts for the last six months. I was so scared of what Ron would do if I told the agents what really happened but at the same token I knew he'd most likely kill me anyways for being such a liability.

Over the next few hours I sat down and told the agents how Ron's business worked and what I part I had to play to him. I was able to ask how they found out I was at Charlie's house and they informed me that I was being followed all the way from Ocala, Florida where Ron had me stowed away for the last four months. T.J, my friend, called my parents

after our first phone conversation and ever since then, the F.B.I were tapping the phone lines and recording every conversation. Completely unaware of T.J's caring act of deceit, I was in such shock that they had been tracking us for so long. I knew now, with or without my help, the F.B.I had enough on Ron to put him away for a very long time, if they could catch him, that is.

Having so many crooked people working for you can be an advantage when you're in trouble. Like having a pair of eyes in every city. Ron was somehow able to find out about Charlie's arrest and immediately deserted the country to avoid legal punishment, not to mention the discretization of his esteemed clientele that the feds were now on to. Ron had so many countless charges put up against him, eventually when the F.B.I were able to track him down they were able to have him arrested in Yugoslavia and extradited back to Miami, he was finally held accountable for being a pedophile, soliciting women for prostitution, and running many illegitimate and illegal businesses. By the time the F.B.I caught him he was in his mid-seventies when he died of old age serving his second year prison for a lengthy sentence. Coincidentally I was told of his punishment and death many years later by one of the same F.B.I agents that had rescued me from Charlie's arms.

I was taken out of the interrogation room after the interview was over with and told to sit at one of the officer's desk while I was waiting for someone to pick me up. Uncertain of who that someone would be I assumed it would be someone from the juvenile delinquents division to take me back to some state operated lockdown facility. Not the nicest of places to call home, but I had no choice in this matter.

Sitting back in the revolving chair I was twirling out of boredom and listening to the roaming conversations within the office. I pondered in fearful anticipation of the dreadful places that lay in store for me. Having to of spent a lot of my adolescence in these kind of places for the sheer factor that my mother said "I was out of control and unable to handle" by eleven years old. There was plenty of just reason for me to be so scared of those places. What I knew lay in store for me were constant fights between the rough girls being settled with violent raids then out came the pepper spray and then the strip-searches and worst of all, no sunlight. It didn't matter if you were a quiet, shy girl that didn't belong there, when there was a fight, which was could be like a few times a week, every person in the room was considered a threat and were treated like a violent criminal. I hated those places and the memories they gave me. That's why I always ended up back on the streets. No child or even a juvenile should have to be subjected to such unreasonable force and neglect. Some of the girls were so used to being subdued to this kind of treatment their

whole life they ended up repeating the same attributes as the people who initially hurt them in the first place.

One very sad girl I'll never forget her, had a father who had been a heroine junkie and decided to play Russian Roulette with some of his addict friends and by fate or chance took the bullet straight through his brain, killing him instantly. Her mother being a heroine addict herself spiraled downwards after his death and gave her four year old child to her ageing grandmother that eventually had to put my twelve year old friend in this un-dire circumstance. I can only have he highest hopes for her today but unfortunately for most girls that have been victimized by society aren't able to ever stop being a victim for the rest of their lives or go on to make other people victims themselves. A sad and unfortunate fate for so many innocent, and it happens so much more than anyone would rather admit too instead of just trying to find a solution.

Chapter 3

Hours later I was still twirling myself in the same office chair when I spun around to see my Father walking in my direction. I nearly fell off my seat at the sight of him. Gripping the chairs handles I couldn't imagine what in the world I would say to the man I once used to call Daddy but now hated for the abandonment and unforgiving wounds he instilled inside of me. He contemplated putting his arms out to hold me but instead anger and shame took over and he just shook his head. I never saw my Dad cry until that day and I have to say it made me feel young again and sad I had disappointed my parents again. The agents now standing beside us led both of us together back into the interrogation room to re-tale my journey to my father who they said I had no choice to tell, or they would have to tell him for me, being I was an under-aged minor and Ron violated the statutory rape law, among many others, when he took me back to his apartment and kept me as his sex slave. My Dad couldn't believe what he was hearing and for his lack of better choice in words asked me to stop talking, he was just happy to know I was alive. Like everyone I'd known in life they would rather brush it under the carpet and not deal with the pain rather than realizing sooner or later it all comes out sometime in our life even if it transgresses into our future then becomes what we are willing to accept out of partners, work, and people in general. Simply saying in other ways than with words that our bad decisions befall our tragedies later on in life.

The next discussion was led to where I would go to from here. Before anyone could put his or her suggestion forward I leapt in with my two bits and made it obviously clear to my Dad that if I was sent away to

another lockdown facility and if he betrayed my trust, again, he would never see me again. I would disappear for good this time and for all he would know I could be dead in no time on the streets. He looked at me and for the first time in my life he saw the many years I had grown up in the time I was gone and heard the seriousness in the tone of my voice when I made my vow to him. He put his head in his hands and told me the bad news, my Mom didn't want me to come home and she was making his life hell for even suggesting bringing me back into their lives. I for some reason threatened her lifestyle and drove her crazy. I had been surprised about a lot of things lately but not that one. The last time I saw my Mom she ever so carefully lied to me and told me she was bringing me to an eye-doctor for an infection. Instead we walked into this tall blue building with people in uniforms holding clipboards and a few muscly guards, she ushered me inside and hurried up to close the large auto lock doors behind her leaving me there alone and imprisoned, which is what led me to recently living on the streets. My life was hell as long as she was in control of it, so when she didn't want me back at home I was fine with that too, but there had to be somewhere else I could go. My dad said he had no choice but to put me back into the facility, but he made a sincere promise that he would not take any longer than a week to try to find a place for me to stay and to go to school. A week I could deal with, but I was still unsure if I could trust my father and hold him to his word, but yet again, I had no choice. Being my legal guardian he could send me anywhere he wanted and there would be nothing I could do, except for keep running. I gave in, and before he left the officers to take me back to the last facility I had run from, I gave him one last hug and reminded him "one-week and I'm gone". Nodding his head and squeezing his arms tighter around me, I could only hope he meant it, but he didn't look too optimistic.

In the police car on the way back to the facility they had to handcuff me in case I ran again, but I had no intentions to anyways. I was going to give my dad the week before I began to search for the right opportunity to jolt again. I was like a "ghost come back," said so many of my girlfriends from the past and there was now a lot of new faces there too. At night when we were all in bed and supposed to be sleeping, I would be daydreaming of better days and imagine myself somewhere in a comfortable bed, actually enjoying my life for a change. A week went by in this facility spending most of my days locked up in what they called "The White Room", a bare room with concrete flooring, no toilet or even a chair to sit on. The only comfort I had was the blue sweater that was provided as part of the uniform, and my hair scrunchie filled with my stowed away cash that no one had found during my unpleasant strip-searches. I would spend hours in the white room for objecting to their

conformity and unwilling to participate in their drilling regime. I didn't feel like I owed any explanation to these people even when they brought a physiologist in to speak with me, "What was the point when I would be gone any day now" and as if any of these people even cared in the first place, I was just another number in the system and they had a job to do.

There was one mega-bitch, female guard, named Evelyn and she used to either really like you or really hate you and God-forbid you were one of the unfortunates that she didn't like, she'd make your entire stay their an agonizing nightmare. Constantly picking on girls who were not strong enough to cope with their predicament or past issues, she'd stand them up and publicly humiliate them, and even when they begged her through their sobs to let them sit down, she'd only torment them worse. Which only made the strong girls want to antagonize the fragile one's with more malicious intent. Luckily when I had previously been there she didn't take much notice of me, but I stayed out of harms way with her, just being quiet and observant.

Being back here seemed like an eternity while I held my end of the bargain but unfortunately my Father didn't. The first chance I saw to run I took it. I was being sent to go get my blood and urine taken for drug and disease analysis. My driver would be a volunteer from the community and it was the perfect getaway for me. I was brought from the white solitaire room and led into the bright sun, feeling like today would be favorable in my escape. We got to the doctors office, my whereabouts told me I had plenty of ways to run and I scouted out the best looking route. My plan was to barge through the volunteer's inexperienced grip and wriggle my way out if needed, then hit the asphalt, running until my legs couldn't carry me any further. Playing it out in my mind felt different to the anticipation that led up to actually doing it. The inner-strength I had was the only thing going to help me in this circumstance.

We arrived in the parking lot and I hadn't said a word to him the entire drive, the small framed Spanish man tried to make pleasant conversation but I couldn't see him as anything but a challenge, so I kept quiet instead, ignoring his humorous attempts to befriend me. The car pulled to a stop and he came around the side to unlock my door, this was it, "here we go" I told myself, and pushed past the volunteer. His arms grabbed out at me but only caught me by my shirt, he didn't even put up much of a struggle, like some of the other trained one's I had gotten before, they would put me into body locks of all sorts but he just tore at the collar of my shirt letting me break free. I had done this many times before so I knew I wasn't gone yet, I had to first get out of these clothes. The cops would be looking for someone of my description in the area with a blue shirt and khaki pants, so my first stop was a busy shopping complex. I took the money from my scrunchie and bought myself a pair of jeans, a shirt, and

a sweater for disguise and my next stop was Dunkin Doughnuts' to get a chocolate iced doughnut and a cup of coffee. I didn't have doubts about getting out of the facility but I wasn't expecting it to be so easy this time. My past excursions all began with an abrupt struggle sometimes ending in a brutal state of affairs after being pepper sprayed and fastened into some painful lock by forceful men four- times my size, then tossed into solitary until I saw my next chance to desert. I got to know the guards real well, as I spent a lot of my time being dragged down to the white room by them. There was Jim, a large black man who could've doubled for a "Miami Dolphin's" defensive linebacker. John was another big man with a ponytail and a mustache, and he looked like someone who definitely owned a Harley. The last guy Scott had a smaller build but made up for it with his steroid injected muscles bulging out of his neck and their was the added height from his curly fro. When they weren't restraining me and holding me captive in solitaire, they were actually pretty nice guys, not afraid to have a laugh after some explosive incident and I held no contempt towards them either, they were just doing their jobs.

It was de'ja'vous all over again, free at last but where would I go now. With Ron's scouts on the lookout for me, and now the authorities being notified I was a runaway again, I would have a lot of people searching for me, so I knew I had to be careful where I went. My last stop before leaving the shopping center was to use a payphone to call my parents, my Dad answered completely surprised to hear me on the other end, I wanted to sarcastically thank him for breaking his promise to me and I hope he is happy now, he just lost his daughter for good. I stopped to listen to what he was trying to say and he told me "I was getting you out in a few days, I found you somebody to stay with, she's a good person who has got teenagers your age, I was just trying to convince your Mother to sign the papers to get you out of there".

I was so outraged at her ability to put her own wants before the needs of her own flesh and blood daughter. I told him to come pick me up and bring me to the house so I could speak with her for the first time in over a year, but if I felt threatened for one second I will be on my way quicker than a blink of an eye and on my own for good. He wasn't overjoyed at my proposition, knowing what position this put him in as her husband but as my father he decided to put me first for once and take me home to confront my mother.

I arrived at my house for the first time in a long time and everything looked different. My parents refurnished and renovated the house. I didn't even have a room anymore, my old belongings and bed were removed and it was now the office. Of course my Mom didn't meet me at the gate or the front door like her long lost offspring reunited. No, instead she

waited for me to come find her outback smoking cigarettes and having a beer. She stood up from her seat and squinted her eyes loathing in her hatred she coldly slapped me hard in the face. The slap stung, but I matched her look with a familiar stone-coldness that only she could understand. Immediately we both started to cry and we washed away our anguish and resentment through our tears and consolidated our feelings for the first time since the chaos first affected our lives. She didn't want to know much of my whereabouts and she still had a lot of anger to get over but she asked me to stay home at least. My little brother ran through the back door and hugged me so tight, I started to cry again and was saddened by how much time I had missed the time I had lost just hanging out with my brothers and it took me even longer to realize how precious time really is. We were never going to be the average Joes next door but at least this was better than nothing. I loved being with my family again. We had BBQ's and bon-fires with each other and life began to slowly piece back together. It was bizarre how normal it was when I first got home. I turned fifteen that year and it was the exact cup of tea that I had needed to boost me up and get me on the right track.

I decided to go school to acquire my general education diploma or G.E.D and got a summer job with my Dad at Mar-A-Lago, Donald Trumps exclusive country club in Palm Beach. Surrounded by lush acres of tropical landscapes, manicured gardens, and a mansion made into a beach club for the rich and famous it is known as the "Jewel of Palm Beach". I was in sheer awe at the gold arched ceilings and the grandeur ballrooms.

The spa where I worked was world class, not only oozing in style but in the way each and every clientele was treated with the upmost service. My focus was now set on becoming a massage therapist, and working my way into a luxurious spa like the one I worked for now, only I was a locker-room attendant there. I studied many books about the anatomy of the human body and how you can affect a person's well-being and health for the better through a simple healing touch. It was amazing to me the way the body responded to massage. I was more than just interested. I was determined to become a therapist.

It was one of those anatomy books that I had my nose buried in one afternoon on a quiet Tuesday and it could get pretty lonely in the locker room, so if I weren't busy I'd sit outside by the spa's reception and read my books in the warmth of the Florida sun. A lovely looking woman in her late thirties who spoke with a proper English accent approached me. I assumed it was a general question, "like where's the ladies room or was that the famous model from so-and-so?" but she was more interested in the book I was reading. Only believing at first we were just making small talk she was really intrigued at my choice of reading. She then asked if I

did massage on the side, I stated I was only reading the book and had not yet began to study but one day I would love to practice massage therapy.

She introduced herself as Ghislane Maxwell. I would later find out that she was the daughter of the late prominent businessman and disgraced newspaper tycoon, Robert Maxwell. I told her my name is Jenna pointing to my nametag on my shirt and offered her a cold or hot beverage, as those were my instructed duties at work. She accepted a tea and went on to chat a bit about this rich guy that she worked for and she knew off-hand that he was looking for a massage therapist. Just doing me a good deed out of her kindness of her heart, I'm sure, she offered to introduce me to him. I declined her first proposition, thinking out loud, told her I didn't know the body well enough to even attempt an interview. She didn't seem worried at all by my fear of incompetence saying that if he liked me enough he would get me the best training in the industry. Ghislane thought I had a cheery persona and fit the quota for what he was looking for and as she put it an enthusiastic learner that she said she gathered from the sticky notes popping out of the various sections in my book. I accepted her phone number and the house address and told her I will call her if I am able to come over after work. I rushed over to the tennis courts where my dad was working and told him of the news. We both thought this could be a wonderful opportunity to get my accreditation in massage therapy. Seeing that it was a lady in her late thirties who came off as more of a nurturer rather than a procurer, neither of us saw any reason to be hesitant.

Chapter 4

At around Five p.m. my dad drove me down to the bottom of "El Brillo Way." on the Palm Beach intercostal. We pulled into a short driveway beckoning a large pink mansion with heavy wooden doors. I was so excited about this chance and asked my dad to wish me luck. He gave me a big squeeze and wished me the best. He walked me to the front door and I rung the door chime. Moments later we were greeted by an older gentleman dressed in a casual butler uniform. I told him I was here to meet Ms. Maxwell for a massage trial and he opened the doors for my father and I telling us to wait in the entry as Ms. Maxwell would be on her way any second, and she was. Down the stairs she walked with a warm smile, her short black hair seeming very proper and elegant, for now. She shook my fathers hand and thanked him for bringing me and kissed us both on the cheeks. They spoke briefly about whom she worked for and about Mar-a-Lago where we worked. She was in hurry, you could tell to end the conversation and say good-bye to my dad, which she did so

ever pleasantly. She said the boss was upstairs and waiting my arrival, so with that I said bye to my dad and began to follow Ghislane up the stairs. I was so nervous, but I didn't show it. I kept my reserve and demeanor cool as ice, trying show maturity for the open position. We continued on to the massage room, passing by a grand crystal chandelier, and a couple lengthy wooden hall tables displaying a multitude of photos displaying young girls and beautiful women, trying not to gawk at them I didn't even notice that some of those girls were only wearing their smile.

Ghislane asked me how my day at work was and I told her it was easy peasy as always just trying to make simple conversation. There was a fork at the end of the staircase and she led me to the right hand side. The lights were dimmed in the bedroom but I could still see the King Size bed in the middle of room, we did a U-turn around the bed, which led us into a massage room. Dripping in luxury I could've definitely compared it to the renowned Mar-a-Lago's spa's, it had marble walls and a glass enclosed shower and self-automated steam room at the very end of the Burberry carpeted room. There was a large mirror over a basin to the right of the room with an array of oils, ointments, soaps, and lotions and a small closed door, which I assumed must be a closet. The only thing that struck awkward about this room was the naked man laying face down atop of the turquoise massage table in the center of it. "I had to be prepared for this," I told myself. Massage was something I had never done before so I quickly brushed away my thoughts of possible schemes, wanting to believe whole-hearted this was going to be legit. Ghislane introduced us to each other and I proceeded to make his acquaintance.

Looking up at from his downwards position, he looked me over and gave a smile to Ghislane, an obvious notion of his approval. He was Jeffrey Epstein as she pronounced for him, as if I supposed to recognize his name or something. He affirmed, "It was his pleasure" and replied to just call him Jeffrey, "No need for formalities" he answered, cleverly putting me at ease. This man did not look like someone to beware of. Both him and Ghislane appeared to be very nice people and conscious of their health as their need for massages and spa visits, no alarm bells went off, yet. I was prepped by Ghislane to "treat this as a lesson from her and follow her exact lead, if I did good tonight then maybe I would become Jeffrey's Travelling Masseuse, seeing the world and getting paid well for it". I was very hopeful, a job like this could really make my dreams come true.

I followed suit and washed my hands with warm water so the coldness would not shock Jeffery's naked body, then lathered them in rich body butter. Ghislane told me to always keep one hand on Jeffrey, even when getting more lotion, so it didn't make him lose concentration on being relaxed. She gave me a tip and told me to keep a blob of lotion high up on

my forearm so it prevented me from having to keep going back for more and was less disruptive to Jeffrey. This all seemed for real to begin with, I was being educated about the body and splitting Jeffrey's body with Ghislane, mimicking her every motion. Starting with his feet, we began with his heels and arches of his soles. Pushing the blood up his calves in upward strokes to rejuvenate the body's blood supply and being careful to mind his leg hair didn't pull. I was keeping up with her and enjoying the education. It was so interesting how the body worked and I couldn't believe I was learning all of this for free. Once I got a bit of a groove following Ghislane, they began asking me all sorts of questions about my past and it didn't take long before the conversation led down the darker experiences of my young life. When they found out that I hadn't led much of a normal existence they only probed me with more questions, which being put on the spot answered honestly. The funny thing was they didn't seem appalled at all by my statements, rather entertained if anything. Jeffrey called me a "naughty-girl" with that wry smile of his, and half playful and half defensive, I answered "no I'm not, I'm really a good girl, just always in the wrong places" he then replied, "It's O.K, I like naughty girls" and rolled over onto his front side to expose his complete nude self. He wasn't the first man to show me his penis, so I wasn't shocked at the appearance of his manhood but I was incredibly shocked at his complete ease to present himself with an erection. I tried to ignore it waiting to follow the next directions off of Ghislane, who surprisingly now stood behind me bare breasted. Before I had a chance to even think of replying hastily she began to slowly undress me, while Jeffrey started to stroke his manhood while watching us. She unbuttoned my blouse and removed my bra, revealing my bosoms. Cupping them in her hands she moved her lips across my nipples, licking and teasing them with her tongue making them cold and stiff. Next her hands moved down to my little white skirt, removing the final piece of my remaining uniform. She slid my skirt down my legs with ease, for a moment keeping on my love-heart panties, so they could both take notice of my apparent youth. They even snickered to each other about " How cute she still wears little girl pantie's" Jeffrey said, and Ghislane joined in his laughter.

Acting as my madam, she instructed me to start by licking his nipples and after I had sufficiently pleasured both of them, then prompted me to go down on Jeffery orally while she rubbed her breasts along his body tantalizingly. She moved behind me again this time to remove my panties and start fondling the delicate folds between my legs. I was still in shock from the initial degrading blow. I hadn't even let the reality sink in, it was all too much for me to emotionally handle so instead I hid behind my fears, which I told myself "I wasn't going to ever be worth anything at all and this would probably be as good as it gets for me" after all I thought,

"what have I been trained up for until now". Nobody ever stopped to ask if I was comfortable or if I wanted to stop, no, instead, Ghislane only directed me to conclude the massage session by climbing up on the table to be fixated on Jeffrey, straddling him so he could penetrate me.

When it was all done and over with, I was taken into the steam room with just Jeffrey to get further aquatinted, as Ghislane left the room to go get dressed. He asked me to grab his feet and rub them not saying a word about what just happened, like it was all normal and accepted. I listened to him ramble on about the health benefits of a sauna and the history of it, ignoring the fact of the matter of his pretentiousness degrading my spirit. I figured I had gone too far already, what would be the point in throwing in the towel now after I had done exactly what these people wanted.

Whilst we were sweating out our bodies' toxins, and the steam was blasting my burning face I listened to his lessons, entertaining his ego, I let him become my teacher, he seemed to like that. He sounded like a very clever and intelligent man though. Telling me his story of how he made himself an empire of billions from being a middle-class professor to an elite financial advisor for clientele with only billions in their bank accounts and through his so-called "lessons", He became my mentor and I emerged as his pupil, the teacher's pet.

After the sauna we went to the next glass door beside us where the shower was. He turned tap outwards and stood underneath the water as I stood naked and cold from the temperature difference. Instead of asking me to join him under the warm stream, like I thought he was going to, he handed me a bar of soap and asked me to wash his body from top to toe. It didn't stop there I had to massage the shampoo and conditioner into his scalp as well. I was bewildered someone would ask this off of someone else, wasn't it belittling enough having to endure the illicit massage from beforehand but now this. The surprises kept coming that night, as this was definitely not how I expected my interview to turn out, but that's what I had learned in my short time on this earth, life was full of disappointment.

I let everyone else take the power of authority from myself and use me in whatever way he or she wanted instead of standing up and giving myself the respect I deserved, which in turn would've helped me get through life without all of the abuse I ended up copping. Not given the belief in myself from an early age on I suppose is what affected my sense of control. Always letting the one's with power and strength reduce my inner-self to shreds until I was cut so tiny in size I would be completely subdued to only their wants and needs left ignoring mine. The men I had encountered in my short experience with them only repeated their inflictions convincing me there was no running away from the sick world I lived in, not yet understanding it all came down to the choices I had

made for myself, I needed some encouragement and the right words to unlock my very soul.

Jeffrey told me the towels were on the heated rack just outside the shower and asked me to get one and pat him down. Again putting himself first as I sat there freezing while I compliantly patted down his body with the white fluffy towel until he was dried. I nearly expected him to ask me to dress him as well, but not surprisingly that came later down the track too. I dried myself off and wiped the make-up from under my eye's, keeping quiet not sure what to really say and half-embarrassed from the entire evening's events that just took place. I just remained silent whilst we both got dressed until he brought me downstairs where Ghislane was sitting at a desk holding his black leather duffel bag. When she moved from the chair to let Jeffrey sit down, she passed him the bag and began to tell me that I had great potential to be a massage therapist, they really liked my style and who knows where this could lead too. She asked to see me again tomorrow, same time after work. He opened the bag, revealing stacks of brand-new hundred dollar bills separated with rubber bands to count by the thousands. He grabbed one stack and took out two crisp notes, placing them in my hand. He laughed that it was nearly my whole week's wage at Mar-A-Lago. Only there I didn't have to degrade myself as his new little toy.

When I got home my parents were anticipating my arrival. I kept it simple and sweet with my folk's, only telling them of the lessons about the body I had received and the future prospects in massage therapy that lie ahead. Nobody questioned who I was working for and complimented my ability to be a hard worker. I quickly got out of that conversation afraid I might give away a hint of shame in my eyes but no one caught on. I excused myself to the bathroom to have a shower and stared into the mirror for a moment, asking myself if I could really go through with this only to mentally respond by reminding myself this would be as good as it gets for a girl of my stature and limitations. I scrubbed myself rigidly in the shower as if it would wash away the filthiness of the night, but it didn't help, I could still feel their hands in me and all over me and inside of me. Trying to sleep that night was nearly impossible too, closing my eyes only to drift away to flashbacks of the moments I had to give myself to Jeffrey and Ghislane, each replay an exploitation of my vulnerability.

The next morning I awoke feeling anxious about the day ahead, trying to push yesterday's memory from my thoughts, I was quiet for the whole trip to work with my Dad. Before we got out of his car in the parking lot he asked me if everything was okay, I lied, for his sake and mine. My life was being transformed and I didn't even know it yet, but soon enough I would be a brainwashed tool only used for the sexual pleasure of others.

About to be entrapped in the same life I had broken free from only months ago.

Convincing myself in order to succeed I had to step up from being a girly teenager and start thinking like a young woman, it would be my ticket to a great career and a fortunate life. I told myself "So what if I had to bargain my body to this rich old geezer, some girls get themselves through college by becoming a stripper and using their bodies to pay for degrees, others go down even worse paths." I guess it was just another way to fathom the road I was going down, the effectiveness of the lies I forced myself to believe was working as I continued to tell myself I had to make it any way I could rather than ever letting myself sleep on the streets again. I was trading one shocking lifestyle for another, thinking I was choosing the right one. If I could go back in time to ever meet myself I would choose this time in my life. I'd start with a good hard smack to my head to first shake some things up in there and next I would tell that girl she could actually make it on her own if she just worked hard at earning an honest wage and built her life up slowly. There is no rush or time limit to ever stop reaching for achievement. Sadly enough I probably wouldn't of even believed myself anyways, learning my life's hard lessons through the experiences I continued to suffer.

I went to work at Mar-A Lago that day trying hard not to think of what lay ahead in the afternoon too come, but the later the hour got the more distinguished the knots became in my stomach. I spoke to no one of the details to my explicit interview but told one girl how I was so happy I was now officially studying massage therapy, another lie. My friend was surprised and intrigued that these people who could afford the best of the best of therapists in the world chose an untrained fifteen-year-old girl to perform a massage. She never said it in words, but her body language told me she knew exactly why they wanted to use me and it wasn't for a therapeutic reason either and deep down inside I understood.

The rest of the afternoon slipped away quickly and before I knew it I was standing before those large wooden doors again, giving a moments pause but long enough to draw in my breath and exhale some of the anxiety before ringing the doorbell. Juan answered the door again and told me Ghislane would be down in a few moments and asked to follow him into the kitchen. There was a pleasant looking young girl with blonde spirals in her hair that glanced up from the mound of paperwork before her. Her shocking blue eye's and appealing English accent seemed delightful and she introduced herself as "Emmy", Ghislane's Personal Assistant. I introduced myself as "Jenna" which is what most people knew me as and told her I was on an employment trial to become Jeffrey's massage therapist. She had a coy smile on her face that told me she knew exactly what I was on trial for. Something in my gut told me

this wasn't the first time a young girl had been trialed for the same position I was about to fill.

We were only chatting for a moment before Ghislane appeared and told me Jeffrey was ready for his massage. I was led through the extensively large house to the winding staircase that would lead me up to the same dreaded room where I would have to re-enact last night's performance. I wasn't far from wrong. I gave Jeffrey a massage with Ghislane leading the way again, this time we surprisingly made it to the front of his body and she continued to show me how to massage all the way up to his stomach pushing my hands in a spiraling clockwise circular motion to not disrupt the bowels and then we came up to his chest. He couldn't dare contain himself for one second longer, telling me to put my lips on his nipples and give them a kiss. Jeffrey moaned in pleasure and Ghislane started to undress me from behind. Within moments I was completely naked and Ghislane had her top off. She was caressing my body with her hands while Jeffrey moved his hands down to stroke his loins while he watched her and I kiss and touch each other. I didn't know if she was doing this for the sake of his eye-candy but she sure did act like she loved having the control over me telling me what to do throughout the entire threesome. Jeffrey's climax was always the end to our sessions and this time he wanted to have me make him orgasm orally. Afterwards we went for the ritualistic steam-room, this time Ghislane joining in with us for conversation. She asked me to massage her feet this time while we were in the steam room, showing me that Jeffrey wasn't the only one I had pay my homage to. We all had a shower next and then we all went downstairs to pay me and have Juan drop me off back home.

The following afternoon I received a call at work, surprisingly it was Ghislane asking me to come over when I got off of work again. The compliant side took over and I told her I looked forward to meeting with them today, instead of telling her to go screw herself for lying to me and making me degrade myself more each time I saw them. I finished work for the day and my Dad brought me over to El Brillo Way again, where the vultures were patiently waiting in their lair, he wished me well as I hopped out of his big truck, looking ever so much like his little girl again. I gave him a smile and a wave as he drove down the long driveway, waiting for him to suddenly turn back and not leave me alone to my task. I shook myself out of that calamity and put on my "big girls" face.

Juan brought me to the kitchen again as I waited for Ghislane. He offered me a cold drink and some fruit on a platter, I accepted and was grateful for the rejuvenation before I went to work again. It wasn't long before Ghislane approached me from behind with a cold intense look in her eye. I jumped from my seat, feeling like maybe I shouldn't have been eating and drinking while on the job, as her demeanor seemed annoyed

and temperamental in the seconds that she appeared. She told me I would be on my own today as she had business to attend to, so make sure I remembered what she had taught me, as my trial depended on it.

Chapter 5

I walked up the stairs by myself this time, taking in more of the décor, noticing the more I looked around the more I noticed a different girl in each photograph in his collection of half-nude and topless girls on display around his mansion. I couldn't believe how many girls there were, it's not like Jeffrey was much to look at. He was an aging man in his early fifties with shiny grey hair and characteristic lines drawn down his face as if he had seen harder days. With no prospects of ever settling down or having a family of his own, Jeffrey treated us girls like a piece of clothing he could try on for the day and get rid of the next. So why was there so many girls in these photo's? I wondered to myself if I would end up one of those girls among his collection of forgotten relationships and broken promises.

I continued to make my way up the stairs, and as if all of my senses were heightened from my bare nerves being exposed, I could smell the cleaning detergents recently used by the housekeepers, my observations of the shade of lighting through the concealed blinds as I entered Jeffrey's bedroom appeared golden, and the sound of stillness except for the thud of my rapid beating heart all made me more aware of how nervous I was to be on my own. Not that Ghislane was anything of a comfort, but I didn't know what to expect or how I was going to lead myself into upholding my obligation in pleasing him. I would hope for the best I thought, trying to uplift my confidence as I opened the door to the massage room with the typical scene of Jeffrey laying naked facedown in the massage bed waiting for his entertainment. It was de'ja'vous' all over again. Repeating what Ghislane had taught me, with him commenting on what else I should be doing, until it got to the end and I was expected to grant him all of his spoken desires. We finished up with the shower again and he seemed very pleased in my contribution of myself to him, giving in to every request.

He told me to go ask Juan to pay me, as he was lethargic after the massage and intimate affair between us and now was going to have sleep. I walked back down stairs and told Juan that Jeffrey was asleep and said I had to ask him for my pay. He went to Jeffrey's desk and took out the exact amount I was owed without even asking how much I normally get paid. He then drove me home, only to be back the next afternoon.

The following week was a daily routine, providing Jeffrey with massages and continuously being groomed to fulfill all his needs. Often joined by Ms. Maxwell and her assistant Emmy for sexual trysts of all kinds. I was mentally and physically exhausted from the week of working and having to keep up with Jeffrey's strenuous late night activities. I couldn't believe what I was doing but it was all starting to sink in fast. Most nights when I got home, I'd briefly say "Hi" to Mom and Dad before heading straight to my bedroom. I couldn't even sleep well anymore. Closing my eyes at night I would fight the inevitable flood of thoughts, replaying the moments of shame that ate away myself piece by piece. My only reasoning being I just had to keep telling myself it would all be worth it in the end.

This afternoon Ghislane appeared to be in a much better mood. Instead of taking me straight up to Jeffrey she took me to a yellow guest room where Emmy mostly stayed. It had a balcony where Emmy was already outside reading a magazine and puffing on a cigarette. Ghislane lit one up too and then offered me one. I hadn't smoked cigarettes much before, besides trying to look cool in front of one of my friends, but never really took to them, so when I started to cough from the inhalation of smoke, the girls began to laugh and joke about my in-experience. It was an icebreaker for all of us to laugh and poke fun at me. I was then able to give it back to them saying I would rather be an in-experienced non-smoker than an old lady with a raspy smokers cough. I don't think Ghislane was used to somebody giving it back to her, but she seemed to like it, as long as she was able to have the last say. I knew my boundaries and she liked that I wouldn't cross those invisible lines. All three of us chatted like friends and it started to feel like some kind of a strange relationship was budding. After about fifteen minutes of chatting away, Ghislane instructed me to wash my hands thoroughly, as Jeffrey hated the smell of smokers, and to follow her down the hallway to the massage room where he'll be expecting me shortly. I did what she asked and sprayed myself with the body spray that I always carried in my purse and headed down the hall to Jeffrey's room.

When I opened the door to the massage room surprisingly it was empty. I sat down on the already made up massage table and was careful not to mess up the neatly folded towels on the end of the bed. It was a good fifteen more minutes before Jeffrey made his appearance. It was strange seeing him in clothes for the first time. He wasn't wearing what you'd expect your typical billionaire's attire to be. He was wearing a pair of sweatpants and a Harvard sweatshirt, which he began to remove immediately. This time he wanted to commence our session in the steam room, so I began to undress as well. We went into the steam room and he pushed a few buttons and the steam began to pour in from the marble

wall's built in jets. There was a bench coming out of the wall also made out of marble that went from either side of the room and had a step underneath it where I was instructed to sit on so that I could begin giving Jeffery his massage. Our conversation started off about simple things like how was your day at work, and I asked Jeffrey how his day was lounging around, just being polite to each other. He was acting out of character being a lot more attentive and conversing with me about other things than sex or massages for once. Starting with his heels, ankles, toes and arches in the soles of his feet I massaged all the way up to his calves. It took a lot more strength to massage in the steam room without oils or lotions and the constant blowing of steam in your face making me twice as exerted. I was beginning to really start to heat up when the door to the room suddenly opened to reveal two naked women. Ghislane and Emmy acted as if they came in to join us for a steam bath, but my instincts were telling me otherwise. At least the cold burst of air and escaped steam revived me a bit.

So there was Jeffrey and Ghislane sitting on top of this marble bench, each with a young girl at their feet. Emmy and I continued with the massage until they were ready to head into the shower. There were two showerheads that Ghislane and Jeffrey both stood under while they were being lathered with soap bubbles as we washed their bodies. After the shower Ghislane led us into Jeffrey's bed to finish today's session with Emmy, Ghislane and I performing lesbian acts of foreplay on each other while Jeffrey laid back and watched. Stroking his manhood in much delight, he brought himself to climax, and the session was over within moments. We all got dressed and went downstairs to the kitchen for some refreshments. Like nothing had happened at all, it was all so bizarre for me, the whole ordeal with them since this all began. I couldn't understand why Ghislane and Jeffrey had such an openly intimate relationship but yet never regarded themselves as partners. They rarely kissed and never held hands or even slept in the same bed. It was more like a sexual arrangement between the two of them. She brings in the girls for his peculiar taste and he supplies the lavish lifestyle she was accustomed too before her family lost all of their fortunes. I wasn't sure how to act or feel, always obliging to their needs but reserved enough not to get attached, as if there was this invisible hierarchy and by instinct I knew my place.

We all hung out in the kitchen for a while before I asked when Juan could bring me home as I had work in the morning and was tired. They said no problem and called Juan on the intercom right away, but said we'd all have something to talk about tomorrow. I knew it had something to do with my employment trial and from the way they were acting tonight, I could only assume I got the job, but you never know with these

types of people. Their friendships and partnerships can change like the weather.

I went home that night still confused on how I could let myself sink so low, I had to put on an act like I enjoyed submitting my body and being their new subservient plaything all for the fact that I was making anywhere between $200-$400 for just a couple of hours. Then spent the rest of the night regressing on the entire event in my head over and over again. I battled those thoughts with the hope that I was receiving a profession out of this and making good money in the meantime. All I had to do was keep lying to myself long enough until I eventually believed it.

Arriving at Jeffrey's on time the next afternoon, as I always did, understanding punctuality was a sign of respect and I wanted them to feel as if they had my deepest appreciation for the once in a lifetime chance they had given to a girl of my history. This time when Juan answered the door he told me Mr. Epstein and Ms. Maxwell were waiting for me upstairs in the massage room. I began my hike up the familiar spiraling staircase and through to the room where my arrival was being deeply anticipated. They were already in the steam room awaiting me to join them. I undressed out of my uniform and folded them in a neat pile, which I placed upon the marble basin. Having one last look in the mirror before I exhaling a deep breath as if I was plunging into deep water, I knew today was a big day. I either accepted their offer and trade my morals for opportunity, or walk away with the prospect of one day many years from now trying to make it on my own which I knew endowed hardships of there own.

So confused about what decision to make, I just opened the door to the steam room and let them do the talking. Used to the routine by now I sat below Jeffrey and began to massage his feet and legs as I listened in on their ongoing conversation about travel plans for the next few weeks. Ghislane and Jeffrey turned their attention to me and he asked me how would I like to go see the big city of Manhattan. I told them I had never visited New York before and it sounded like an adventure but my job at Mar-A-Lago was only a summer job and wouldn't be able to get the time off, especially that summer was so busy anyways.

Jeffrey then made his announcement, that I should just quit my job at Mar-a-Lago and become his permanent travelling masseuse. He then further persuaded me with all of the luxuries that came along with my acceptance. Rather than being paid $9 dollars per hour at my current job I could be earning $200 dollars per massage, which he even said could be a few times a day. Tomorrow we could be leaving Palm Beach together in his private jet first heading to his residence in the upper east side of Manhattan, also the largest mansion in N.Y, and would next be setting off to the Caribbean, where he owned a secluded island just past Little St.

James for a bit of relaxation. The temptation of his grandeur offer wasn't hard to give into, my vulnerability to be lewd into his grasp seemed comforting at the time. The idea that females were nothing more than an empty shell of beauty bound by only a body to offer was a notion I had accepted a long time ago with my first teacher, Ron.

My reaction had to be more than amusing for their egos, even though I was excited to be traveling I could only imagine the likeliness of having to be at their beckon call as well. In my head I just told myself we all do what we have to do in our lives to succeed no matter what it takes, and with no one knowing the truth, I had no one to talk me out of it. I accepted his offer and knew from here on out I would be his servant to his sexual desires until one day I would gain my credentials and only then could I go out on my own and make it in this world that when so young seems so unconquerable. The night advanced into the usual grooming of his requirements, for the next hour and a half being exploited to satisfy Jeffrey's every sexual whim.

My mom cornered me that night, before I had a chance to avoid speaking to anyone, heading to the shower then my bedroom, like I had been the last week. She knocked at my door with a hostile look in her eyes, " Virginia, what exactly does an older couple want with a fifteen year old girl, who has no credentials and with no experience in massage therapy?" She used that stern tone of voice that she's always had, when I was in trouble.

Thus, as impressionable as I was, my blue eyes batted their innocence in her direction and I flashed her a girlish grin selling her the pitch that I had been given earlier that night. Not mentioning the other side to the glamorous lifestyle I would soon be living in. I told her about the money I'd be earning, the places I'd be seeing, the people I could meet and most of all the trade I'd be learning. It all sounded so good, except it was a bunch of lies I had to tell her and myself to otherwise convince us, that this was a once in a lifetime opportunity, and I had to take it.

She asked when all of this would start, and I as shocking as it was to me too, I told her I had to go start packing. We were leaving the next morning off to N.Y.C. At fifteen most girls would be sucking up to their parents to go to a high-school dance or to go on a date to the movies with a nervous chap, but I wasn't even asking her. I was simply letting her know that I would be away for the next couple weeks, maybe three and would keep in contact when I got free time. Her daughter was lost a long time ago, and she just now realized it. Backing out of the bathroom, with nothing she could say, she left me wondering to myself who I was becoming.

Instead of driving me to work the next morning my Dad dropped me off at Jeffrey's mansion, he told me not to worry about calling Mar-A-Lago,

he'd take care of it for me. We said our good-byes outside in the driveway, Jeffrey even coming outside to meet with my father to shake his hands and assure him that his daughter will be more than looked after. I hugged my dad tightly, feeling like I was on the verge of a steep cliff, when he let go, so did the last of my innocence.

Juan drove Jeffrey, Ghislane and I to Palm Beaches' Private Airport and the luggage handlers escorted us on the tar mat where we all boarded on Jaffrey's black jet. Larry was his main pilot, he had shiny grey hair and long lanky legs, but a very sincere smile that instantly made you feel at ease. He greeted us at the staircase that led into the main cabin. It was as lavish as I imagined it would be. The seats were enveloped in the finest beige leather with polished wood grain finishes and there was a kitchen in the back with an adjoining toilet. Jeffrey saw the amazement in my eyes and to make it more thrilling he brought me up to the cockpit and let me watch with a bird's eye view of the take off. I was on a natural high when I came back to the cabin and was instantly brought back down when Jeffrey rested his bare feet on top of the reclined seat and instructed me to get to work and start massaging him. My future was in his hands now, so when he wanted something, I wouldn't hesitate in giving it to him.

Chapter 6

Upon our arrival at New Jersey's Private Airstrip, the driver Jo-Jo met us. His name was most likely shortened for something of his oriental decent. Jeffrey liked to shorten the names of his multi-cultural staff into American names. Even Juan and Maria were known as John and Mary. We arrived in the Upper East Side of Manhattan. His principal place of residence was the largest home in Manhattan, eight stories of opulence. It used to be a Private School for boy's many years ago, until Les Wexner, Jeffrey's best friend and mentor bought it for him as a mysterious gift.

There were two large Chinese gargoyles outside the entrance, and beside the heavy looking wooden doors there was an intercom with a camera overlooking us. I walked up the concrete steps into a realm of wealth, glamour and most of all influence. My eye's glistened at the splendor of his palace. Caramel colored marble tiles spread through the first floor, where his gourmet kitchen and dining hall were also located. Then I came to this sweeping staircase that curved into the next level where Jeffrey and I went into his office, even though it looked more like a museum exhibit. Ancient draperies that told lascivious stories of their own covered parts of the elevated walls, and the remaining wall spaces were taken up by rows on top of rows of books. He loved to read, as he

often found it hard to sleep and was comforted in the early morning hours with his literature, or sometimes in other ways I would come to find out. There was a mantle piece and a sofa with two armchairs next to the grand piano that flaunted more of Jeffrey's beautiful conquests, young women posing in salacious pictures, suggesting I could be easily replaced next to one of those girls if I failed in keeping him satisfied. There were also some pictures with recognizable political and royal figures either shaking Jeffrey's hand, or with an arm around each other, even one with Jeffrey and the Dali Lama, although his church was the bank. He liked to use his power, wealth, and money to manipulate everyone in his life.

He made a phone call that sounded business like and I didn't mind, I was quite enjoying taking in all of the beauty around me, I was blinded by all of it. I was still waiting for him when, Ghislane came in. She asked me what I thought so far of my trip to N.Y.C, I knew she was talking about the house, she loved to gloat, even though none of it actually belonged to her, she wanted everyone to believe that it did. I complimented her on the mid-evil looking tapestries and a few other adornments, when she cut me off mid-sentence to compliment it herself, telling me the history about one of the 17th century tapestry's which to an unsophisticated eye, looked to me like a rug on the wall.

Jeffrey hung the phone up and walked over to the sofa where we were sitting next to the mantle piece and took a seat on one of the armchairs. He didn't seem worried from the phone call but his mind was definitely somewhere else from the hard look on his face. We all spoke for a few moments more about the splendid décor before Jeffrey had enough small talk and needed some of his own relaxation time. He told Ghislane he was going to show me to the massage room and he'd be back in a couple hours. She agreed he looked like he could use some time to unwind and with that wry grin of hers, she gave me a look that told me precisely how he was expecting to be relaxed.

We left his office all together, Ghislane going downstairs, and Jeffrey showing me to the lifts. The lift looked like it's original that came with the school. It was made out of brass antique with archaic cuts throughout the arches at the top. It wasn't the only lift in the house, but certainly the most beautiful. We walked down a long hall carpeted in a royal red and golden trim, passing by a bronze pagan statue of the horny little goat God "Pan". How adequate, I thought, fit Jeffrey to a tee. We walked into this dimly lit room. Another daunting chamber that looked like we had stepped back in time to the dark ages. It took a second for my eyes to adjust to the darkness, and Jeffrey beckoned me to follow him through the room to the open adjoin shower, toilet and steam room. The room was in black marble to accent the dreariness, and smaller than the one in Palm

Beach, but it had it's own witchery feel to it. Another unseen side to this Man I was coming to know.

We both undressed and I followed Jeffrey into the steam room first. He loved feeling clean, teaching me that the steam would deplete the toxins from your skin, which was great during a massage when your blood flow is being replenished. I grabbed his foot out of instinct, knowing I had to be constantly on alert to keep this man satisfied. He looked down at me with a nod and reclined back against the wall as the steam pored in, this was his idea of alleviation. I worked up to his calves and within a few more minutes, he said he was ready for his massage on the bed. We got out and towel dried off, both still nude, he asked me to stay undressed, then we headed to massage bed in the middle of the room. He lay down on the bed and told me to turn on the CD player on the wall hutch, where all of the oils and lotions were set out, I hit play and a collection of mixed classical symphonies began to fill the silence. I could tell he wasn't in one of those moods to be uplifted with idle chat, so I remained silent, letting him enjoy my slow movements, making my way up his body. My instincts told me I was right about his mood, as he seemed to appreciate the quietness of moment and the leisurely of the strokes I was using to massage him. When I got to his scalp he turned over, and grabbed my hand to put on his erect manhood. No words spoken yet, I took the gesture and initiated what I had been taught over the last week. While pleasing my master his hands groped my young flesh, penetrating my insides with his fingers, he was only concerned with what he wanted, as If I was a new car out for a test drive and he was pressing his new gadgets. His soft moans were soon brought to louder heaves of breath and my job was done. No intimate kisses, or sweet pillow talk. He showed his appreciation with money, never attachment. We concluded with a shower and he told me he had some business to conduct. He walked me to the lift and told me go to the next level and my room was the first one on the right, it had an intercom in which he can contact me when needed.

I hit number 5 on the lift and took his directions to my room. I opened the door to this massive loft, the size of an adequate house. I walked down the long hall and my eyes took in the magnificence of my surroundings. It was a room fit for royalty, and later would find out had been stayed in by some. The room was trimmed in gold paint and had another eerie tapestry on the main wall as feature. There was a T.V and a huge king sized bed, with goose feathered comforter and pillows.

All of the glitter from Jeffrey's lifestyle he was offering me finally covered the last bit of sight I had left and I let go of my consciousness. Excited by my enthralling day, not having anyone around to have to act reserved, I jumped into the soft bed and lay looking around, thinking about how quick life could change based upon one swift decision. Dazing

into the artistry, the intercom buzzed on the telephone next to the bed and it was a housemaid letting me know Jeffrey wanted to see me in his office now. "Already" I thought to myself, I was just getting settled in. I was worried I was going to get lost in this ancient museum, but I got myself back to his office with no trouble, it was kind of hard to miss. I knocked at the slightly ajar door and Jeffrey called for me to enter. I walked over to his desk, where he was just ending a phone call and he opened his duffel bag full of money. "I'll be out at my other office for most of the day, so instead of being locked inside I thought you should go do some sightseeing for the day since it is your first trip to the Big Apple" He didn't count how much he was giving me he just handed me a bundle out of the banded $100 dollar bills. He knew just how pull the right strings, making me squeal in delight and give him a kiss in the cheek, since we were never really emotionally intimate, it would be odd to act in any other way, but he seemed to like it.

I ran upstairs to get dressed for "City" shopping and put my make-up on, then hit the streets of N.Y.C, looking for a place to start spending this load of dosh. When I got to the end of 72[nd] street on 5th Avenue, I had no idea which way to turn, left or right. I thought I'd just follow the lights past Central Park and see the local sights on my way. My eyes were once again peeled back in splendor. I had never imagined a place so busy with the hustle and bustle of all the walks of life. My first stop was to buy a disposable camera and I was off taking photos of every wonder that caught my attention. I didn't do much shopping as I had planned too; I was having too much fun exploring this capacious metropolitan.

When it started to hit dusk I began walking back to Jeffrey's but not before stopping off to enjoy a giant slice of pepperoni pizza, it was the best I had ever had, and considering I was going back to Jeffrey's chickpea and tofu salad's or such. I really hated the healthy cuisine served by Jeffrey's personal chef. I was a naturally skinny girl, never watching what I ate and to eat that food I might as well have chewed on hay. I strolled back to Jeffrey's and was missed. Ghislane scolded me "You shouldn't have been gone so long young lady", "We need to know where you are at all times, you are on call for Jeffrey" I started to apologize, feeling guilty, I didn't want them to think I didn't take my job with them seriously. She cut off my explanation with a short conclusion to this conversation "We will get you a cell phone tomorrow, so we can always find you". I thanked her for her generosity, and she dismissed me to my room. So I wasn't even needed after all, it was just a way for her to place me deeper in their control. The next few days I was on call, as Ghislane said I'd be. Venturing out to the city for only an hour or so at a time, I looked most forward to my outings. I would return to Jeffrey's

mansion to attend to his sexual desires and when he was finished with me, I'd be off to my adventures.

On the day before we were to be heading back to Palm Beach, Jeffrey had a new proposition for me. I could make double the money I was making, if I would look for pretty girls and convince them to come back to Jeffrey's to be further persuaded with money to engage in bi-sexual and sexual acts with Jeffrey and I. I asked him how does one actually propose such a thing to a complete stranger? "Well" he said in a build up to another kind of lesson. "If I were you I would use your charm to entice them and my money to bring them, I would tell them you work for a multi-billionaire who has a taste for young, beautiful girls and with his contacts in the acting, modeling, or rich husband world, your boss could help them. All they have to do is come meet me first." If I wasn't so naïve at the time I would've seen that's exactly what he was doing with me, my prospects were massage credentials, but with too much pain from my past, I could only have hope. Not that I was a shy girl, but picking up girls for one reason alone, only to be endorsed for her body, didn't sound like something I could do. But not wanting to displease my master, I told him that I would give it a go. You could tell he was instantly excited with my agreement, he started to reveal the politics of what kind of girls he was looking for. He wasn't into multi-cultural girls, a very chauvinistic perception; he said they had to be uniquely gorgeous to be accepted by him, but definitely no African-American girls, he was racist against anything different to his kind, a very narrow minded way of thinking for such a supposed brilliant man. The list went on and on. No girls with tattoo's or piercing's, or gothics, no drug users, or prostitutes. Basically he wanted everyone's daughter that looked like the girl next door, with blue eyes and blonde curly ringlets. I just nodded and smiled, wanting this to be over with and move on to another conversation, but so worked up from our previous talk, instead he persisted to show me exactly what I was good for to him. He took me up to the highest loft in his large mansion and he lay down on his large bed, expecting me to know exactly what he wanted done. As always, I complied. Part of me hating him for having to degrade myself to be so subservient to his sexual whims, and another part of me was telling myself to be grateful for the opportunities I was being given.

The battles in my head were beginning to cause me too much anxiety, when we got back to Palm Beach, I asked my Mom to make me a doctor's appointment for some headaches I had been getting lately, so she wouldn't question me. I walked out of the doctor's with a prescription for a mind-altering anxiety tablet called "Xanax", not only did it help with anxiety but it also acted as blanket over terrible memories. So when I had to perform degrading acts, I would take a few pills and forget what

happened within the next hour and be able to become someone without a battling conscious.

I spent my sweet 16th birthday on his island in the Caribbean next to "St. James Isle" he liked to call it "Little St. Jeff's", his ego was as enormous as his appetite for fornicating. I was given a birthday cake and a new collection of designer make-up from London. Ghislane made a joke after I blew out my array of candles and said, "I'd be soon getting too old for Jeffrey's taste, and soon they'd have to trade me in." She was only half joking in a sad reality though. A few days after my birthday, a girl was flying out to the island to join us for a few days before flying back to N.Y.C. I was introduced to a pretty girl a few years my senior, named Sarah. She had long ash blonde hair and big brown eyes that hinted she had a cheeky nature. She had known Jeffrey before I had, and he was supposedly trying to help her get an acting job in L.A. She was obviously accustomed to the lifestyle he provided her, making it ever so apparent with her prompt attention she lavished on him. She would do things like strip nude and bathe around the swimming pool, taunting him for sex. She was good at what she did, even putting me at ease with her cool persona and funny jokes. Jeffrey told me privately that she was one of his best at procuring young girls into her entrapment and delivering them to him when he was in town, and when it came to time in the private chambers with Jeffrey, Her and I, it wasn't hard to comprehend. She was devoted to the moment, giving Jeffrey every imaginable lustful desire he could fathom. On the last night there we all took a trip over to St. James to go for a stroll, odd I thought, it was past 7pm and Jeffrey rarely strayed out past then, unless it was some event or dinner party. While Ghislane and him looked the average couple strolling arm in arm through the streets, he said to Sarah and I, "Why don't you two hit the night club here and see if there is anyone interesting to bring back for the evening?" It was more of an order than a request and then I knew why we came out tonight and why Sarah was invited, tonight was all about training, and Sarah was going to show me the ropes in picking up girls. Although there was no one to accustom to Jeffrey's distinct taste to bring back, watching Sarah flirt from girl to girl like a floating butterfly, gave me enough insight into what I was expected to do.

Within Months I had become his handy little helper. Not only would I run to his beckon call, but I also aided Ghislane in bringing in more girls to keep the appetite of our sexually starving chief from going hungry. I once asked Ghislane, why she did what she did for him, instead of having a common monogamous relationship and getting jealous like normal partners would? She replied simply "It takes the pressure off me having to do it". That said it all, we were all under the shade of Jeffrey's money tree, and not even someone like her could escape from its lure.

Just like Ghislane had trained me it was now my job to reiterate that onto other girls and thus the cycle of girls trying to climb the chain of hierarchy would start all over each time I brought a new one in. The sessions rarely differed much. They would mostly start out with Jeffrey on top of the massage table already naked and me leading a girl into massaging him until his instructions came to remove our clothing and if they agreed to that, then Jeffrey knew he had them in his pocket, and could do what ever else he wanted. He was never turned down in the many years I stayed with him. Never being shy, he would tell us to start kissing each other or depending on what he wanted we would perform erotic acts sometimes with him fondling us, or just masturbating while he watched. On explicit occasions, sex toys would be used on us girls, making it all the more exciting for him to observe. Ending with a payment of $200 for the new girl and $400 to me for bringing her. He would then wait for us to leave before adding the events details of names and payments in a little black diary he kept with him wherever he went, so if he were in anyone of the city's he lived in, he would always have contacts for sex.

I was slowly climbing the ladder, as Jeffrey was happy taking me everywhere with him, within the States. Merely at home I distanced myself from my Family altogether and with Jeffrey renting me an apartment in Royal Palm Beach as well as a plush furnished apartment in N.Y.C, there was hardly a need to see them. I just couldn't face everyone thinking they all knew what I was really doing travelling around with a man old enough to be my grandfather who supposedly only wanted me for massages. Much further convincing myself of the lies I told myself, I took a liking to the Xanax, it felt like it was all a dream at times, even meeting up with old contacts from school years who experimented with drugs. I was flying around the country, seeing so many places in America I had only heard about in Movies and making more money than anyone my age and loving it. My friends didn't believe the lies I told them about only being a massage therapist, some of them even asking if they can meet Jeffrey too. At this point in my life my heart went missing for a while and I stooped so low, I was even bringing my friends, I just saw them as easy commission. When I wasn't playing servant to my master, I was partying hard, eventually using ecstasy pills, acid, and marijuana to disillusion the times I would've had away from Jeffrey to think about what I was actually doing with my life. I realized something one day while I was alone, although I had Jeffrey to attend to sexually, it was not gratifying. I needed someone to come home to, someone I could call my boyfriend and that showed me emotion not just a job to get done.

Chapter 7

A knock came to my apartment door one lazy afternoon while we were in Palm Beach. I looked through the peephole and didn't recognize the once familiar face. I asked from behind the closed door "Who is it"? The voice of the reply was one I wasn't anticipating to ever hear again. It was my Junior-High crush and childhood friend, T.J. The last time I saw him I was a runaway and he had let me stay at his house for a few days, telling his parents nothing, he kept me hidden away in his room. At nightfall he said to knock on his window and I could jump through and stay the night. Until I was picked up by authorities during school hours and questioned why I wasn't in school they did some resourcing finding out I was a runaway, then delivered me back to my angry parents.

"Oh My God- You finally answer your door girl", and in a whirlwind, T.J stormed back into my life. Even moving into my apartment, secretly, within two weeks of his arrival. He had changed so much from the last time I had seen him. He used to be this hard looking rocker type, now he was cleaned up wearing preppy clothes and shooting out Tupac Lyrics. He had the same old big brown eyes though, and when he told me he had heard I was back in town but he was unable to ever get ahold of me he just kept knocking at my door every so often, I was sold. How sweet I thought, he must care about me if he was so intent on approaching me, not even thinking he would've spoken to the girls from our junior-high circle and they would've mentioned him I was back in town, what I was doing and where to find me. We were a drug-induced romance, which budded from fake emotions the affects made us feel. He got what he wanted, a free ride and not having to work, and I got what I deserved, a man who could let me go away with this multi-billionaire I regarded as my second boyfriend.

I didn't want to alarm Jeffrey in me having a boyfriend so I kept it quiet, until during a massage I was giving to him one afternoon. We were having a conversation about some of my friends, the party girls I had brought in to meet him. Jeffrey started asking questions about the different types of drugs they used hearing them speak about it in his presence. " I thought a person on drugs would be all strung out and looking like hell, but the girls you know look great" he stated face down during the massage.

That's when I told him I had been dabbling in ecstasy lately too, and I thought it was the most amazing feeling one could even fathom. I tried to describe the euphoric feelings it gave me and even joked with him about wanting to pet anything furry that was around and then there was the constant need to flick my tongue-ring around my mouth. It was great

having such an open conversation about things Jeffrey had never experienced before and he seemed okay with everything I was telling him as we were having a good laugh together, so I thought I could push it a bit further and tell him the truth about T.J, since it was bound to come out sooner than later I'd rather not the latter, when it would look even worse that I kept the truth from him for so long.

"Well why were opening up about things together", I continued by saying "I had met someone from my past and we have been hanging out a lot lately. When I haven't been travelling with you I have been with him and I was wondering if you minded if I started to see this guy." He started to laugh out loud, "Are you serious? Of course not, no one in this world is monogamous, why would I expect you to be?" I was smitten with relief, but a little bit dis-heartened when I heard him speak that way and I wondered to myself if he'd had his own personal encounter with heartache.

Of course the evening concluded in the same way it always had, the only reason I was really even there in the first place. Upon his request I straddled him on top of the table and let him explode with pleasure inside of me. Thinking the entire time about T.J, I felt so terrible but I quickly had to wipe the thoughts of guilt from my mind not to give Jeffrey the wrong impression. So I had myself busy with two men in my life, but that's not what I really wanted for myself. I wanted an occupation that would eventually set me free from depending on a man as my source of survival.

I asked Jeffrey before I left for the evening, when my real training was going to begin and he liked my assertiveness. I thought it meant to him that I was taking my job with him seriously, but it was all part of his master plan to keep me by his side. Within a couple of weeks of my persistence, Jeffrey introduced me to a couple of real working massage therapists, not only with credentials but with their own clientele too. I was in awe of their teachings, it all made so much sense about the body and what they were saying. I felt like I had picked myself up out of the lurches and had a direction again.

I was in the middle of another training session, with Jeffrey the recipient as usual, being it was rare for Ghislane to ask for a massage unless of course it was for Jeffrey's own pleasure to watch the punch line of the session, when I was shocked to hear Jeffrey ask one of the therapists to now remove her shirt. He had no shame I thought. Even though she was above his usual age criteria, she was still a pretty woman in her early 30's with curly blonde hair and had an athletic body for a mother of two children. She didn't hesitate in his request. It looked like something out of a role-playing porn scene with the therapist removing

her white uniform to reveal her beautiful nude body and a much darker side to her personality.

I couldn't believe it at first it was such a state of shock and I began to question t myself if this was normal in the massage profession to expect this kind of clientele to request such degrading tasks even though they were professionals. At the end of the session she was paid $300 dollars an additional hundred for helping to train me as well, and I was paid my usual $200 dollars then we were both invited by Jeffrey to join him out by the pool for a cool dip. With Jeffrey making a few phone calls while her and I undressed again for a swim, I wanted to ask her a few personal questions about what she's come to learn about the Massage Therapy game, but I never got the chance as we were joined by Ghislane moments later. She was asking how my training was going and booked the therapist in for herself in the following morning. Where she was invited back to do another training session with me. It didn't take me long to figure out why.

I was at my apartment when I received a phone call from Jeffrey, I thought it was the usual call to come over to his house, but he surprised me. Instead I would be going to the exclusive hotel in Palm Beach tonight, The Breaker's, where I would be meeting my first ever clients. Only told their first names I was given some instructions and the address where to meet Glen and Eva. They were a married couple with one on the way. I was quite concerned when I heard she was pregnant, being I really didn't know the body that well and didn't want to inflict any wrong doing on the unborn baby but Jeffrey insisted I take this job. Just massage her gently where she wants to be rubbed and to save all of my energy for Glen's massage, since it was going to be a four-hour job. In an emphasized tone of voice I was being coached by Jeffrey to treat Glen with exactly whatever he wanted, just like I do for Jeffrey himself. It was my last bit of preparation before he sent me out to his friends and my first taste of responsibility in upholding his reputation.

At around seven pm I took a taxi to the address I was given and found them on the residential side of the giant hotel's extensive property. When I arrived in their apartment it was a far cry from the lavish place I was expecting, still really nice but had a cozier family feel to it. It was just beginning to get dark when Eva and I went into the Master Bedroom and she undressed to reveal the first naked pregnant body I had ever seen. It was fascinating to see her in the later stages of maternity, and strangely enough it was a miraculous and wondrous sight. She was a former model and one of Jeffrey's many entourages from his past that had gotten to old for his taste and was married off to a wealthy colleague of his.

Lying down on the bed I adjusted the pillows to try and make her more comfortable and I began to massage her as Jeffrey had instructed me to,

softly and slowly. So at ease with her nude body she even asked me to massage her swelling breasts, in a non- sexual way. Not knowing any other way but that way, I was trying to oblige in her request doing the very best I could to relieve her but couldn't help but giggle to myself at the very sight of this. She said she was very happy at the end of the massage and rolled over to go to sleep, asking me to turn out the light at the end of it. I closed the door gently as if not to disturb her, and went to find my other client.

The apartment's lights had been turned out for the sleeping children and I found Glen awaiting for me in the lounge room where I had to call out "Excuse me?" as I couldn't see him in the dark. There was a throw rug on the ground that he had already placed out as he began to strip down in preparation of the massage. Lying frontwards facing me with his exposed and ever growing manhood, I asked him to roll over to begin the massage. He complied with a cheeky smile and from his eagerness to show he was not shy indeed, I already knew where this was going to end up.

I found it much more strenuous to massage on the floor but I wouldn't let that hold me back I wanted to have a career and this being my first ever clients, I didn't want them to disapprove. Nearly four hours after I had gotten there I was still hard at work. Mentally preparing for the end of the session he let me know when he was ready to begin the other side to my job and just like Jeffrey did the first time, he requested me to take off my clothes starting with my shirt. When I complied, the requests kept coming in and before I could change my mind and run away, I was having intercourse with this man that was so comfortable doing all of this while his pregnant wife and children slept in the room beside us. When he had climaxed, we both got up and dressed and he paid me a large tip even though Jeffrey would be the one to actually pay me for my time spent there. Just like it had all started, it had also ended so quickly and now that was that. I had to accept what my duties were and now I could go back to Jeffrey who would be further pleased in my demonstrations to keep him happy.

I was called the next morning to come over to Jeffrey's mansion that afternoon for lunch, a swim and of course a massage session. Knowing all too well they'd be expecting the gory details of last nights events with my new clientele. I came there at 1pm as requested and sat down for a light lunch and a swim. Jeffrey was mostly conducting business from his offside pool office, but he came to ask me if everything went well the night before. I told him I did everything asked of me and I am quite confident both my client's were more than pleased with me. He gave me a quick grin, before he headed back to the office, throwing a purple grape down his throat as he walked away.

Lying out on one of the pool decks blue and white striped lounge beds I was waiting for Jeffrey to finish his business so I could give him his massage. He never took too long with his work, unless there was something wrong and then we would all have to wear his mood but today he seemed fine though, when we went up the stairs he told me we would be leaving for his ranch in Santa Fe', New Mexico in the morning and I'd need to be packed and ready tonight. They loved leaving in the spur of the moment, Jeffrey once said he checks with his pilot Larry on the best weather before he heads to a different destination. I enjoyed spending time at his ranch being it was my favorite of all of his residences. He had a lavish Mediterranean looking castle on top of a hill that over looked his extensive 7,500 acres of property. It has an indoor pool, gym, and all the trimmings of extravagance I could only imagine. I had a great time on the quad bikes, Sarah and I often got scolded for tipping one over going to fast or trying to go up a steep hill, but we knew those weren't the things he cared about, so it wouldn't matter. My favorite of it all was his little town with it's own fire station and truck, stables full of horses, and little cottages where the housekeepers and ranch hands lived.

On my own time I would take one of the quad bikes down to the stables and saddle up on one of his beautiful horses and go for a ride in the open terrain. It was coming up to the end of a very cold winter and it still had the snow covered mountaintops and brisk air that I loved to take in during my many trail rides. I have been an experienced horse rider since my childhood, and could honestly pinpoint some of the best memories of my life being on the back of a horse. I acclaimed with thrill in my voice "Great, I'll get packed as soon as I get back to my apartment" he threw in "Pack for a few weeks, as we will also be making a pit stop to L.A for some business afterwards and then to N.Y.C." I was used to these round trips with him, it was great as I was saving loads of cash and about to buy myself my first car.

Jeffrey, Ghislane, Emmy and I all left the following morning, as planned. Arriving in only a few hours at his awe-inspiring Santa Fe Palace was always a delight. Still frisk in the air, my petite frame looked even smaller in these gigantic overcoats. Nonetheless I was looking forward to spending time out in the fresh clean air and open land. After a few days of leisurely spending our time on the ranch, we went to the Indian markets in Albuquerque for a bit of shopping and sight seeing. Jeffrey wasn't the most off road kind of guy, so when we went sight seeing it was more like museums, boutique shopping, and local art galleries. Still a splendid trip though. With me picking up a few nifty collectables to bring back for my family and knowing how much my mom loves Indian apparel, I thought it would put me back in her good books for awhile, I hoped at least. There was some lengthy time to put a

little water under the bridge between my folks and I. With my life heading in a different direction I didn't see any use in holding on to so much hate especially that I didn't even have to see them that much.

We got back to "Zorro Ranch", the name Jeffrey chose to call the massive land he bought to build his fortress on, and Jeffrey told me that he was looking forward to one of my famous relaxing massages and with that notion he gave my bags of shopping to one of the many housemaids who greeted us at the front door and asked her to bring my bags to the exquisite room I was staying in. We headed straight downstairs just past the massage room and gym there is an indoor heated pool, shower and spa. First Jeffrey wanted to warm up in the spa underneath a decorated ceiling of clouds and blue skies. Starting the massage in the spa I rubbed his feet while he reclined into the spa's jets. We spoke of the museum and some of the knick-knacks I had bought and I thanked him for the turquoise earrings and necklace he had got for me as a gift, joking about not ever knowing what to get for him, being that he was richest man I'd ever known. By no far means did we ever have any kind of a mutual respectful bond between us, but there was a significant softer side he began to share with me that was different from how he treated his other girls. Maybe it was my feet that filled the shoes for that time being, or the fact my novelty hadn't worn off yet, but what ever it was I was getting confused from the double-sided life I was leading.

He got up from the spa tub shortly thereafter and asked me to come wash him in the shower. It was nothing unordinary to me, I was used to his need to be nurtured and pampered. I performed his request with a cheerful mannerism, letting him think I was taking care of him out of my sheer sweetness. I got the towels ready for him to get out of the shower and towel dried him, patting his skin instead of rubbing as previously instructed. "You know you have a very maternal instinct, you'll make a fine mother someday", he would constantly acclaim at my gentleness. "I hope so" I replied, I would love to have my own babies one day, but not any time soon". Laughing at the very thought of that.

We walked up the steps and through the French doors into the gym's adjoining massage room. It was smaller room than in his other houses, placing the emphasis on the large massage bed in the center. I grabbed another clean towel to keep him warm while I prepared the music, lights, and oils. He liked me to use mostly lavender or other aromatherapy scents, which reminded me of woodlands in the spring. Always enjoying the beginning of the massage, I put my heart and soul into training in my profession. I could just close my eyes I would see only with my hands the areas that needed the most work, and even though I wasn't a professional yet, Jeffrey could feel and told me there wasn't many that could please him during a massage being untrained. I'm sure now it was just

something he'd say nice to all the girls, but in the time I had known him I could honestly say it wasn't like him to compliment girls in any other way than regards to a sexual performance or their looks. I was flattered at his praise and when the massage was over, so were the sentiments. I was back to being used for my body and what I could do with it.

With him satisfied and off for a nap, I could go do what ever I wanted, like usually I would go down to the stables or something adventurous, but today I was in a melancholy mood, just wanting to relax and unwind myself in a giant tub in my bathroom. I got out some of the oils I used on Jeffrey putting them in the steaming water and popped two of my Xanax pills, forgetting about my troubles and focusing on the quiet moment at hand, just wanting to soak up the peacefulness of it. Nearly slipping away to sleep in the tub, I was startled when I got the call on the intercom to come down for dinner.

Everybody seemed in good spirits at dinner, which helped to lift mine. We all ate our meals and went into the movie room to watch a newly released movie. It was a ritualistic scenario, most nights that everyone was at ease we would all sit in one of his various located movie rooms and hang out together. Just as he always would Jeffrey asked Emmy and me to both grab a foot during the movie that night and just keep massaging through the film. We were always on call for duty, no matter where we were or what ever time it was. He would just plop a foot up or pass over his hand at any given time and require a massage, even if the film went on for over two hours, I would still be required to sit on the floor rubbing his feet or hands, and even his scalp at times. After the credits had rolled Ghislane got up to close the door to the room and I knew she had received the signals herself and would proceed to manipulate, violate, and use us to satisfy Jeffrey's urges once more before he went to bed.

The blue illumination from the empty T.V screen was glaring in the tenebrous room as we watched her undress in a light that relied on the reflection of the moon through the windows peek to show it's proceeding display. She walked back to the sofa where I was sitting at Jeffrey's feet still rubbing away and uncovered her shirt displaying ample bosoms for his appeal. Approaching me like a lioness hunting her prey she stood me up and led me to the other couch across from Jeffrey and situated herself on top of me, sliding her fingers through my dress to unbutton my attire, revealing my girlish figure and two small peaks. Pushing my head into her breasts I was being fondled by Emmy at the same time, which took her cue when she saw Ghislane look in my direction. From an occasional glance upwards, I could see that Jeffrey was up to his methodical foreplay stroking his manhood while watching the build up to his main event. They both took turns making me moan from their touches and when

Ghislane was ready too she would insinuate we do the same to her. She urged me downwards, until my head was between her opened legs and giving into her wanton indulgence. Twenty minutes passed before Jeffrey exerted his last energies for the night, the only advantage of being with an old man was they could never last long.

Departing to our own separate quarters for the night, I called T.J for condolence. It was so important for me to feel like I had someone out there who saw me as more than a pretty girl with vulnerabilities. I needed to maintain some sort of a connection to my youthful side. But it would be to no avail as I was getting used to being badly disappointed by all the men in my life.

Chapter 8

The phone nearly rang out and as I was about to hang up the receiver when he finally picked up. On the other end of the phone I could hardly hear T.J above the background noises. When I asked where he was he told me "At our place baby", meaning the apartment Jeffrey had rented for me to be staying in alone. He already sounded off his chops elongating his words and slurring his speech. There was music pumping and people shouting behind him and every one sounded like they were having a great time. I was so sick of his friends coming over using my house as a place to party and then trashing it so bad I would even have to sometimes throw my furniture out. I blew up at him over the phone and threatened to kick him out, back to his parent's house, so much for my relaxing evening I thought to myself venturing on to tell him "You leech off me using the money I leave behind for you for drugs and throw these gigantic parties while I'm away." Also mentioning the disastrous messes I would come home too. "I am so close to ending it with you", I would openly threaten, but he knew better than I did, that I just couldn't bring myself to do so, needing some attachment to my youth through all of this. "Don't worry baby" he would say attempting to soothe me with his false words going on to tell me how much he was missing me and how he was always thinking about me when I was away which was like all the time.

I would soon be buttered up and soft for serve. This was my penalty for choosing a guy that accepted my lifestyle with my "Other-Man" as I had so eloquently put it to him once as not only acceptable but deemed it "Cool". The conversation ended with an easy good-bye and no "I-Love-You's" or anything sweet. We weren't those kinds of partners yet, so much time spent away from each other and the lifestyles we both led, I couldn't expect much more from him than what we already had.

Jeffrey and I left two days later, heading off to Carmel in California for a business trip of his, leaving Ghislane and Emmy to catch a commercial flight back to N.Y.C, where we would meet up with them later. When we arrived at the hotel we were given badges for the meeting tomorrow and settled into our rooms. We got adjoining rooms, keeping the doors open at all times, but sleeping in different beds. He liked sleeping alone, even after a late night session I would always go back to my own room. I think that's why he liked me so much I never put pressure on him to become intimately more than what we were already, never giving him the impression I wanted more than what we had. It seemed to keep him happy just the way we were together. I hung out with Jeffrey that night, going to a restaurant for dinner and afterwards watching a movie back at the hotel.

The next morning we went for an early morning breakfast before the conference and Jeffrey gave me some money to go shopping instead of attending the all day meeting with him. I was more than obliged to accept his request, and wished him a good day before planning to meet back in the room around six pm. He gave me five hundred dollars. He said it was just enough to go have fun for the day and a girl of my means could find plenty to do with that kind of money. I walked around the many boutiques that lined the streets of the picturesque cozy town, and picked up some bits of clothing here and there and even met a girl who was passing through on a road trip. She was somewhere in her late teens with golden sunshine tresses, olive skin and blue eyes. Her name escapes me, as it was so unexpected, I think it was Tina or something like that but she was your typical California carefree chic, offering me a few tokes of her jay as we ducked down a side street together. I was so happy I had met this girl, as she was fun spirited and charismatic a relief from the social expectations I had come to know lately, but always being "on-call" as I had been trained up to be, I ended up inviting her back to meet Jeffrey at our hotel later on as a surprise for him. Maybe she was just a bit too carefree for Jeffrey's taste but anyhow she was pretty enough to let him be the judge of that matter.

Over the next hour of hanging out together I found out that she was on a road trip with her best friend who was still sleeping off the hard night of partying from the night before. She was originally from the southern states as she had a bit of draw still left in her accent, and she had recently left her boyfriend because he was leaving for a college too far away not believing in long distance relationships. Then it was my turn to dish out my contribution to the conversation of getting to know each other better. I always got anxiety before I would tell a girl what I did for work and romance (as such), morally I was ashamed of who I was especially with a girl having led somewhat of a normal life. Next, as always, I expected to

be probed with so many more questions and having to make Jeffrey sound ideal and hot for the taste of a young girl and knew I would be point blank lying, so I told her some of the truth which was that he was really rich and paid good money for a massage and useful to have around as a contact. I told her he'd give her two hundred dollars for a two-hour massage with me leading the way and warning her he was known to be frisky during the session. Unexpectedly she said she could use the money and then came the part that I hated the most, but had to do so they wouldn't be as shocked as I was the first time I had met him. "He does like us to be nude though and sometimes asks for more than just the massage itself". All I could do was wait for a response after a shocking sentence like that, and depending on the girl, most were sadly taken back by the money. Her carefree attitude seemed to disillusion for a moment when she gave it some thought and asked me "He's not like, fat and ugly, is he"? " " No…no…not at all" I replied, "He's got more of a Richard Gere appeal to him". Trying to make him sound a little more measurable than just a rich old man that likes to be with girls younger than half his age. "Well then, what time shall we meet tonight"? She asked next. Great, I thought, Jeffrey would be most pleased with my find. "Knock on my room quietly, you're going to be a surprise. Be there at around half past seven tonight and I will introduce you to Jeffrey". She threw the butt of the second jay we shared in the bushes and we strolled into a homemade fudge boutique to get some relief for the munchies we now had.

When I got back to the hotel at around a quarter to six o'clock pm as requested I'd be, nobody was back yet, so I took the time to set up the oils and bath in my room for his massage tonight. I thought I would plan it so the girl would be cleaning off, as Jeffrey liked before he had sexual contact with a new girl and he could walk in and be surprised to find a strange beautiful girl in my room who wanted to massage him. Jeffrey walked through the door not long after I was done prepping for the night ahead, looking like he had a rough day at the office, which was very rare for him. He sat down on the bed and I asked him how his day was. He didn't want to talk much about it, saying it was boring and long, rather asking what I got up to for the day. Being coy about having a jay and his unexpected surprise to come, I told him it was a great day of shopping and sight seeing and I even brought him back some local made fudge from the shop that had fulfilled my chocolate cravings only hours ago.

Telling him of the places I ventured into I mentioned to him "We'd have to hit the fisherman's wharf tomorrow. I saw some locals walking around with breadbaskets filled with creamy clam chowder and it smelled absolutely scrumptious." He said if the weather were nice we'd check it out tomorrow before we left for L.A. He wanted to take off his jeans and

collared shirt and put on his normal attire of sweatpants and a sweatshirt. Ushering him out the door for dinner when he was more relaxed I was lucky when he said he was starving and quickly got dressed. We just found a quite spot to eat that was next to the wharf and got back to the hotel just in time for our surprise guest. He wanted to go have a shower and settle down for a massage, so I told him I'd join him in a minute, I just had to make a phone call real quick which he thought was odd and asked me if everything was alright, I reinstated that I'd just be a minute, trying not to let on about anything. The knock came quietly on my room's door just on time, as we had planned and I told her my idea to surprise him. I let her into the bathroom where she orchestrated my plan perfectly. Jeffrey finished his shower without me and when he called out for me I told him that I needed him to have a look at something in my room real quick. Not giving in to what it was that he would be looking at, he came into the room where I opened my bathroom door to reveal a beautiful nude girl bathing in a thick amount of soap bubbles in my tub looking at him with an alluring intrigue. His grin went from ear to ear when she stood up and introduced herself letting the bubbles run down her glistening body at an ever-slow pace. It was a proud moment for Jeffrey, I had done well in his eyes, and she was not like the other girls I had brought to him before, degraded from a lifetime of abuse off the streets. This girl was exactly his pro quo looking sweet and innocent as the girl next door. My efforts were to show him I knew that my only responsibility was to keep him happy at all costs. I led her through the massage on Jeffrey and of course afterwards gratifying his perversion with his lustful requests to be fondled and watch us become more than just friends. I didn't feel too bad at the time with his coercion providing many financial rewards making his scheme enticing to a young, impressionable teen not realizing the terrible memories left to come from all of this. Afterwards he paid her the usual two hundred dollars he gave to everyone for their time and took down her name and phone number writing it in his infamous little black book of the contacts he met in every city but only the ones he really liked made it down in his records.

We went out the next afternoon as I had suggested last night and we ate our clam chowder breadbaskets over looking the wharf's bay, watching the seals playfully barking at each other on the rocks nearby. Shortly after we were driven to the private airstrip and took off for Los Angeles. On the plane was an unexpected visitor. Matt Groening the producer of the "The Simpson's" T.V show was catching a ride with us. I was so excited, as I loved watching his show and acted like a star struck fan, asking him everything from his initial idea for creating the show to where he got his characters from. He told me it was all based on his own family make up,

but without the crazy father and son scenes of Homers hand around Bart's throat.

I was enjoying our conversation, when Jeffrey insisted that I give Matt a foot massage throughout the duration of the short flight. I never turned down a client but when I saw the shape of his feet, I nearly threw up at the thought of having to touch them. He had yellow crusty toenails that even someone with a chainsaw would've had troubles cutting through and then there was the fluffy balls of leftover pieces of sock wedged between the crevices of his sweaty toes, now that was the real icing on the cake for me, no way could I attempt this I thought. Then I had an idea. I went to the back of the plane and rinsed a wash cloth in warm soapy water and returned for his dreaded foot massage but not before attempting to clean them first.

In return for my services Matt was kind enough to draw me two quick sketches on blank paper from his briefcase of my two favorite characters, Homer and Bart. I asked if he would make them out to my little brother and dad, the true fans of the family not missing an episode during dinner over the past ten years or so. Next to the A-4 size drawing he was able to fit in the quote "To my greatest fan from Matt Groening" and their names next to it. I knew they'd absolutely love it, and it was such a nice gesture his feet were no longer an issue as I laughed it off and even made a joke to the comedian about getting a pedicure before hitting L.A's beaches.

The flight was only short and we arrived in busy L.A within the hour, saying Good-Bye to Matt, who was a pleasure to meet. Jeffrey had a meeting at a production studio for one of the girls he was keeping lured in his grasps, so we were off yet again for more business. We were staying with one of his old girlfriends, Jeffrey's code for "She got to old for my taste, but was still nice enough to keep around". She was a tall blonde with blue eyes, a stereotypical Barbie doll. In her younger years she had been a successful model and now lived on the beaches of Santa Monica with a sweeping view of the oceans landscape as her backyard.

The next morning Jeffrey and I went out to breakfast. He said Sarah Keller, would be joining us with another one of Jeffrey's girls I hadn't met yet, her name was Nadia Bjorlin and she was a Yugoslavian model turned aspiring actress, with the help of Jeffrey, as he so proudly remarked at the table before they arrived shortly thereafter. She was a stunning brunette with olive skin tones and shocking blue eyes. By far one of the most beautiful girls I had ever met before. She and Sarah approached the table, shopping bags in hands already in the early hours of the day. They both pulled out a chair and showed us their new pair of Jimmy Choo's they had bought on their way here this morning, and excitedly asked for Jeffrey's opinion. He loved the doting attention and anyone who could make him feel important. We all went back to Sarah's

apartment that Jeffrey rented for her on Malibu Beach. This was the first time Jeffrey came to visit and when we got there you could see why. It was a tiny one-bedroom shack, too small for his likes of accommodation, but she loved it and it was plain to see why, the waves lapped underneath her porch twice a day, what else could anyone want. Before even walking through her door, you could hear the commotion of excitedly screaming females voices coming from inside. There were about five other girls in Sarah's living room and she had invited them so Jeffrey could have a few different girls to choose from. Jeffrey looked at Sarah and smiled, aren't you sweet, as all the girls rushed to introduce themselves, hoping for the opportunities Sarah had offered them to come in the first place.

We all had some coffee and biscuits while the conversation kept getting louder and louder, every girl trying to talk over the next one. Jeffrey could handle only so much of that before getting too annoyed. Instead of choosing one of the other new girls, Jeffrey wanted Sarah to show Nadia and I into her bedroom. He was anticipating the introduction of his two favorite girls together, what mischief he had hoped we would get up to was apparent when he asked where Sarah had kept her play toys and not the fisher price ones. Sarah brought out quite a collection of her personal toys and was giggling on her way out as she shut the door. Suddenly the room behind us went quiet, probably hoping to catch a moan or groans too laugh at and I felt so degraded having everyone knowing exactly what was going on. Knowing my duties well I was baffled this time as there was no ritualistic massage wanted. He immediately instructed us to start kissing and fondling each other with the provided toys straight away seeing his excitement grow watching us try and out do the other one with pleasure, he couldn't keep restraint any longer and started to have intercourse with the both of us, taking his erect penis out of the other to only swap to the other girl, back and forth. This continued for a good fifteen minutes or so while we continued to engage in lesbian acts on each other while the other girl was being subdued by Jeffrey's thrust's of penetration. Nadia was just as dutiful as I was in fulfilling his demented requests, willing to lend her body to Jeffrey and those he sent her too, for the sake of keeping her acting career and putting on a good act at that. She was never competition though. Once I found out where she actually came from I took pity on her for the similar life of servitude we were both accustomed too and not that we ever became good friends but we had reason to relate to each other.

Later on Jeffrey, Nadia and I went to a production studio in L.A, where we had to meet with Nadia's agent as well as the producer of "Day's Of Our Lives". The meeting lasted five minutes, with everyone in consent to the proposal. We flew all the way out there to talk about money, only to be leaving that evening back to N.Y.C. On the way to the airport we

stopped at a fifties looking diner and got a cheeseburger and vanilla milkshake, the first and only time I saw Jeffrey eat what I considered to be real food. Seven lanes to drive in and the freeway was still lined bumper to bumper in the heavy rain. The sound of downpour on the rooftop of the taxi and the rhythm of the windshield wipers was making me sleepy. I was looking forward to sleeping through the long flight back. Thank goodness we had a private jet to catch back, the trip would be comfortable and not rushed to get there on time through the daily peak hour traffic. Jeffrey asked me what I thought of Nadia, more of a kiss and tell kind of thing for him, so proud to admit some of his tenacious acts of pedophilia to me that I knew most people would be embarrassed to even think aloud but I said what he wanted to hear when he asked me what I had thought of her on the way back. I replied, "She is attractive, funny, and seems to know what she is doing with you." Laughing at my statement, he then started to tell me the history behind where he got her. Five years ago when she was merely a teenager just turned thirteen. Her father had recently passed away, leaving Nadia's mother in a tremendous amount of debt and living in a third world country, she didn't have the means necessary to raise her own daughter. When Ghislane approached Nadia for the first time at a music school, she seemed like a maternal, caring stepmother. Telling Nadia's mother if she let Nadia go with her, she would se to it personally that Nadia receive the best education and chances in life to make it. In her customs it wasn't odd for a young girl to be married off to bring the family good fortune, so she kissed her baby girl good-bye and sent her off to commence her life of servitude. I sat there speechless listening to Jeffrey brag about his endeavor to get her over here, shocked that he could stoop as low to use a barely teen to oblige his sexual desires. He was laughing and giddy as he replayed the memories of her arrival over in his head, painting me a horrific picture I had no choice but to imitate a smile to face him with.

No pretty girl is safe from the allurement of these villains procuring the youth off of every street in the world. I knew that day more than ever before those morals did not exist for people like this. Jeffrey once told me that every girl he has had sexual relations with has benefited in their career, finances, or an achievement in marriage with a successful colleague of his. Mine was the massage career, ever so often still giving me a lesson from a professional, which kept me quiet for a while longer. I thought I was already knee deep in this world, if I gave up after putting myself through all of this hell it would've all been be for nothing. So I treaded lightly, constantly at a risk of being replaced by another willing participant and playing the eager student he wanted me to be.

Chapter 9

We met Ghislane and Emmy in N.Y.C, and it wasn't a blissful reunion as I hoped for, wanting a break from all of this I was just looking forward to getting back to Palm Beach, not leaving for a further four more days. I got home late in the evening as Jeffrey invited me out to the movies after we had relaxed at his house for a while after landing.

I put my keys through the door to my apartment and walked in to a quiet house. Not thinking anyone was at home I set my suitcase on the floor and put my cell phone on charge as I always did to be accessible for whenever Jeffrey or Ghislane could call. I went to get a drink out of the fridge when I heard some noises coming from the back of my apartment where my bedroom was. I started back there and slowly turned my doorknob to reveal T.J on top of another girl. When they noticed they weren't alone anymore, T.J got off her with promptness. I recognized the girl from seeing her around at parties, and she was the town lowie, scattering her trail of guys along with her presumable diseases, and I wasn't shy to verbalize that when she tried to open her mouth and calm the heated situation between T.J and I. She didn't like her cards on the table in front of the guy she was screwing around with and got up in a fit of rage to attack me. Still nude with only my new white sheets to cover her body, I threw her out of my house along with T.J. "I have been paying your way for months, only finding out your sleeping with the biggest slut in Royal Palm Beach, at least have some dignity and higher your standards." I didn't really have a leg to stand on since I had started this relationship giving him the knowledge I had a sugar daddy to answer to above him. "You're gone all the time and with that old man, what did you expect me to do"? He was right, I wanted what I couldn't have, but I needed some time to cool down and accept my situation. I loved having T.J around to come home too, and he used to be my best friend in my school days. I convinced myself of the lies I continued to accept.

Days later I was still not speaking with T.J, mentally adjusting to my circumstances, I thought I'd have the day off to relax since I hadn't been called all day. Until about five pm when Ghislane called and said Jeffrey would like a massage in an hour. Grudgingly I got up from relaxing on the couch, got dressed and put my make-up on, meeting Juan downstairs a half an hour later. Jeffrey was already lying on the massage table when I walked in. I started the massage being very quiet from my somber mood, when Jeffrey picked up on it and said "you know it's not good to massage people when you're angry, you could pass on negative energy". I wasn't sure if he was serious or just trying to be nice so I could speak about what was bothering me. Ending up not being able to contain my

emotion any further I told him what happened with T.J and broke down in tears, a little heart broken from living in such a lie. He turned around from his massage and sincerely paused for a second thinking he was going to console me but instead he laughed at the very prospect of my notion that monogamous relationships ever existed. "Are you serious, he was only doing what every guy in the world does, you can't hold that against him". I replied in a lighthearted gesture "whose side are you on anyways"? His answer stuck with me for many years to come "I'm on your side which is why I'm going to save you a lot of grief with this one tip, Never expect a man to be faithful and you'll never be let down, it's just the way us men are genetically imprinted." The remainder of the massage I had to pretend like I wasn't further saddened by his response, but in fact having to act enlightened. I would never come to him for any other relationship advice, ever again. He told me I'd be fine if I just listened to my mentor. He still loved role-playing the teacher and me the pupil, like the old days before he got rich and only used to be a college professor. I finished the massage and fulfilled my sexual duties before being sent home wanting to collapse in anguish.

T.J was outside my apartment door when I got there, his mom waiting downstairs in her minivan just in case I kicked him out again. He pleaded his guilt and promised that he would never see her again, agreeing with me that she was the town slut and he screwed up big time. I let him back into my apartment and back into my life for that matter but more aware of the world I was being led into believing was of normal conduct accepted by everyone in this sick world. Jeffrey was going back to N.Y.C and told me to have a few days off before his assistant at his office would arrange an E-Ticket on a commercial flight for me to join him later in the week. I had just made loads of money from my previous trip and wanted to relax like any teenager does, so I threw a hotel party that weekend on Singer Island in Rivera Beach, inviting only a small group of friends to begin with.

The hotel room quickly filled up with a flood of teens and the pumping music was blaring. The room had a balcony overlooking the pool and the beach that became the smoker's section. I wasn't a real smoker at that point, preferring to have a puff of a spiffed blunt instead so I made it my rule to go outside trying to prevent holes in the carpet, but it didn't last too long when our forbidden walls came tumbling down. Making so much money that I could supply my wild parties with an assortment of drugs like trips, ecstasy, and coke as well as an abundance of alcohol, that T.J had all the contacts for, made my fellow teens admire me. It definitely gave me a head swell, thinking here I was so young but so grown up already with all of my peers from high school looking up to me. In the wee hours of the morning we were all still going hard with our eyes

dilated into little black diamonds. We were all having in depth conversations about life and where we would all end up when this charade was all said done. Nobody got to sleep that night as the room slowly dwindled in numbers as people were finding their way home to recover from the repercussions of drugs wearing down out of their intoxicated system.

When I flew out to N.Y.C to meet Jeffrey the next day, I was still in a horrible state. Not knowing what was wrong with me, thinking it was just a bad come down, I rushed out of the elevator and down the hall to my room, sweating profusely, to make it just in time to the toilet to throw up bile again for the uncountable time since getting off the plane. I was having intense cramps in my stomach and when I was called down to meet Jeffrey in the massage room, I had to decline for the first time. I told the housekeeper that I was feeling very ill after the flight, maybe some off food for lunch and needed to lie down for a while. Nobody came up to check on me for hours or even called. Waking up from my much-needed nap, I pulled back the expensive white sheets to find myself in a pool of my own sweat and blood. I was covered in the red stains that drenched the pants I was wearing. I had no idea what was going on, I could only focus on the dire amount of pain I was in. In between the heaves of throwing up and crying simultaneously I was able to reach the phone and called the housemaid on the intercom. I told her I needed to go to a hospital immediately and slammed the phone down only to fall back to the floor hurdled in a ball. She didn't hesitate in calling Ghislane who ran up to see what was wrong. Ghislane then called Jeffrey who was in his office at the time and told him to hurry up to my level, stressing to him that it was an emergency. Thinking they really cared about me for the first time since I had known them, they came with me to the hospital with me. Now I realize I was only a liability in getting them caught and they needed to get to the doctors before I could say anything incriminating. They were suspecting the worst now and seeing he never wore a condom with me and from our previous conversations they knew I always made T.J wear one, they feared the situation at hand.

When he saw the catastrophic state I was in at that point, it was the housemaid who helped me get up and assisted me down to the car where Jo-Jo was waiting for me. He drove us to either Lennox Hill Hospital or Mount Sinai, I can't remember, as it was so blurry in such a bad condition. Rushed in for immediate testing I was uncontrollably vomiting and in so much agony, I was given an injection to help me to subside the intense pain. A nurse came in to ask who would pay for this and although I insisted my parents insurance still covered me, Jeffrey persisted that he take care of all the medical bills and gave the nurse his information.

When the pain relief kicked in, everything and everyone dwindled away until I felt like Alice in Wonderland who just swallowed the shrinking tablet and everyone standing around me seemed to move so quick, speak so loud and hover above me. When I awoke from my induced state, I was alone in a different room. Not knowing at all what went on but feeling a little better, I called in the nurse who looked through my charts and checked my vital signs. Then told me the doctor would be in shortly to inform me of the conclusion to my illness.

He was a tall man with dark hair, and a hardened look about him obviously from his job and constantly seeing the worst horror stories man could think of, he just bluntly told me I had miscarried in early stages of pregnancy. I should be fine to go home as soon as my course of intravenous antibiotics was complete. The news sunk in fast and hit a deep nerve. I waited for the doctor to close the curtain before I let out any emotion and cried for my disastrous lifestyle that was dragging me into a world that I wanted to break out of. This reoccurring cycle of believing I needed men like Jeffrey to succeed in my life was draining the last bits of sensitivity left in my heart. I was picked up by Jeffrey himself who took the doctor alone to the side of the busy hallway to have a private conversation about something. Jeffrey wasn't comforting at all, instead he sent me back home to rest for a couple weeks, and I only fell deeper into a depression, using all forms of self-medication to treat my sorrows.

Two weeks later, as if Jeffrey was trying to lighten my spirits, he told me I would be going to his island to meet a new client He is a Harvard Professor, named Stephen █████. I would be spending two days with him showing him around the island, dining with him, and treating him to a massage whenever he wanted. Without Jeffrey even verbalizing the need to have sex with him, he told me to keep him happy like I had my first client. I packed my suitcase with island apparel, and kissed T.J good-bye, who had at least offered me a warm embrace upon the news of my miscarriage but none other than that knowing it wasn't his.

Stephen was a quirky little man with white hair and a mad scientist look about him. We arrived separately and I greeted him when one of the housekeepers picked him up from the airport and arrived by boat, instead of helicopter as Jeffrey and Ghislane often arrive on. We made our acquaintances and he looked as if he was tripping over himself with words, obviously delighted with his company and location for the weekend. I showed him around as Jeffrey had asked and took him on an adventurous quad bike ride around the small curvy paths, leading the way and letting loose my hair, doing something that gave me a natural high instead of the prescription one. The sights alone were breathtaking from the mountainous peaks of the untouched parts of the island, we sat at a cliff and just sat there, not saying a word to each other besides to

compliment the sights mother nature that appealed to us. I didn't feel as if I owed this stranger anything but what was expected of me by Jeffrey and I could be polite, I just couldn't be myself.

We got back to the main villa to see what time dinner would be served so we could have time to unpack and clean up beforehand. We both met at six pm for dinner on the outside veranda. He sat at the head of the table and I sat next to him, politely folding my napkin to put in my lap. The first time Jeffrey and Ghislane had seen me cut meat and eat with a fork and knife they were so appalled, making fun of my unsophisticated habits. Ghislane took the fork and knife in her hands and proceeded to show me how to politely cut my food and eat. Now that my mannerisms had improved they wouldn't have to be worried about my etiquette when someone important was around anyone. We both drank the red wine supplied on the table and it seemed to warm me up on the breezy night By the time dinner was served and another red wine bottle later, he seemed to get funnier. I made fun of his tousled hair and he poked at me for my skinny legs, calling me a wanna be- anorexic. When dessert was brought out, he asked if he could receive one of the delightful massages he has been hearing about from Jeffrey. I gulped more red wine down and sweetly complied with his offer, dreading the moment I'd have to see his naked body, let alone touch it. I asked the housekeeper Kathy that had been serving us that night to please have someone set up a massage bed in one of the cabana's. I went to my room to down a few Xanax, telling him I wanted to freshen up after dinner but to meet me in his cabana in twenty minutes or so. I was ready to go as I had said, twenty minutes later, with the effects of the tablets mixed with the red wine, and I would be free not to feel anything. He was still dressed when I got in the cabana, obviously not accustomed to this and a lot shyer than what I had been used to, I told him he'd need to undress and lie face down on the table, putting a towel to cover his bare bottom to prevent him feeling embarrassed during the massage. I gave the massage my earnest as I always had, and quickly got through having intercourse with him. Not wanting to make any foreplay or anything extravagant out of it, I let him think that's as good as it got, and by the smile on his face, I thought I had done enough.

The next day I took him down to the beach for a real massage under a tiki-hut on the waters edge. It was one of Jeffrey's favorite places to have a massage, as he droned out to the sound of the waves and my gentle therapeutic strokes. Afterwards we had lunch back at the main villa and went back down to the beach to swim out to the water trampoline about one hundred meters off the dock. He didn't do any bouncing around or anything like that. It was just a good base point for a rest spot after a long

swim. What was really cool about it though, was you could see through the mesh and watch fish swimming underneath.

The rest of the afternoon we spent by the pool reading magazines and eating fruit plates. Eventually he went to his cabana to have a nap later on. That night after dinner and my mixed cocktail of Xanax and red wine, I asked if he'd like another massage before I went to bed. He just wanted to stay up watching movies in Jeffrey's theatre room. As peculiar as that request was to me I didn't argue it, I just hoped I hadn't disappointed him in any way that could make it back to Jeffrey. I showed him how to use the remote and turn off the T.V when he was finished before going to bed. The next morning we were both catching a flight from St. Thomas and we had no time for anything other than breakfast and packing, which saved me from having to be too polite as we said our good-bye's from the terminal in the airport, both hurriedly off in separate directions, thankfully. I arrived back in Palm Beach, only to be told to catch another flight the next day to N.Y.C, where Jeffrey would fix me up the money he owed me for treating his colleague out to an entertaining weekend.

Chapter 10

I was fixed up more than what I had usually made for two days, which was great because that car I had been saving for was finally within my reach. I had been waiting for the freedom a car gives every teenager for a long time, and now that I had over fifteen thousand dollars saved up I could pretty much afford to go buy myself a nice car outright. Looking much better than the last time I saw him Jeffrey acknowledged it. I went to his office where he was waiting for me and he had a guest with him. She was unusual looking to the common stereotype drop dead gorgeous girls Jeffrey had normally introduced me to. Of Asian decent, her name was Rena. Jeffrey had met her at an art gallery where some of her own artwork was on display. She had a bubbly persona about her and I could then understand why Jeffrey liked her so much, she fit into the subservient category that he liked his girls to fall under. It was apparent to me that they had already slept together in the short time span they had met, as there closeness was oddly noticeable and I wondered what it was he was offering to her in exchange for her body. I found out later from Jeffrey that he was buying her artwork, promising her the world as an artist, telling her he'd have her work in the all the museums in N.Y.C and the best art exhibits. Everyone was promised something, and seemed to be bought off in someway or another to be in his company. It was only a matter of time that the truth would come out.

To my own amazement Rena was to be assisting me in Jeffrey's massage this day, not being a total knockout or anything spectacular, looks wise that is, but for some reason he seemed intrigued enough. As we made our way through his spectacular mansion she was in total awe at every corner. Commenting on the present artwork and décor that we passed in every hall, it no longer seemed so grandeur to me anymore but hearing someone else speak about it in such excitement reminded me of the days when all of this seemed so unforeseen.

When we got to the massage room, or "The Dungeon" as I used to put it for it's medieval looking appearance, we firstly out of custom all had a steam shower, where Jeffrey expected me to walk her through a servants duties, telling her to take his other foot and start rubbing in small circles and stroking the arches of his foot rhythmically. Rena took the instructions well and began to massage him too. When we all went to the shower next and she followed in my exact lead washing his body as well. Jeffrey absolutely loved the fact that two teenage girls were dually pampering him. Jeffrey wanted to move to the massage bed and I had to further begin to show her about the body, upon his accord. She mimicked my every move up his legs and buttocks, keeping up with every stroke until he could not contain his arousal any longer and was already requesting us to start kissing each other, the start of the very reason we had even met in the first place.

He blatantly stopped the massage nowhere near being complete and turned over to announce his increased arousal in a physical abundance of grotesqueness. Moving over to the small couch in the corner of the room he made a space for her to lye me down on the massage table as she had commanded him to do in such a domineering tone that he wasn't used to being spoken down to with. From that very moment onwards and from the look on his face he was yearning for her to orchestrate an hour of deliverance upon my meek nature. He started to stroke his erect manhood as he was being tantalized watching her take over every inch of my body in a dominating act of seduction. I was left breathless and soar after my first introduction into the world of S&M.

Rena considered herself a dominatrix, she loved bondage, whipping hitting, and eventually cutting her sex partner with little sharp knives until they subdued to her punishment in agonizing pain. She was absolutely crazy if you were to ask me, and I couldn't help but wonder what got her into this in the first place. All I knew was that Jeffrey was absurdly taking into the appeal of watching us two interact, often with her acting as my mistress who would fondle me with an insurmountable amount of whips and toys. Then she would love to finish off every session by hitting me across my face with a hard blow from the back of her hand and sneering over my curled up body showing Jeffrey her ability

to make others surrender to her extreme force. She could be so opposite all of the sudden and be tenderly intimate with Jeffrey stroking his penis lovingly and even speaking in baby talk to him, which he seemed to adore.

He loved us pairing up so much that within months he made Rena an official even renting her an apartment at the same place he had one for me during my extensive trips out to N.Y.C. Sending us out shopping together at all of the underground seedy sex stores downtown we would bring him back thousands of dollars worth of sexy outfits, sex toys and bondage material. His favorite one was a black leather studded collar that lead down the back of my spine to cuff my hands and feet together, offering Rena the most compromising positions to wield her afflictions, one she was excited to pick out for my usage.

She was good at eradicating my softer side though. Helping me forge an unpredictable scenario of me turning the tables on her, making her at my will instead of me always being at her twisted discretion. Jeffrey loved the rivalry between us, both striving to dominate the other one but to me it was just another way of surviving her punishment. All for show I thought she was a madman let loose in a torturesome domain of violent sex and unbearable beatings. I wasn't sure how long I could hold off this charade of S & M, I just didn't want Jeffrey to think I couldn't give him everything that she could, always being replaceable in his company.

She and I could often come across as good friends to his blind eye but it was only a matter of time before the animosity inside of me was going to snap. Doing normal things too made it all half bearable. Having a lot of similar interests we did fun things like go to the theatre to watch "Phantom of the Opera" or visit several historical and art museums together, afterwards treating ourselves for a giant piece of greasy N.Y.C style pizza. Like I said, we really liked each other purely as friends but the dominance in the massage chambers was taking it's toll on our strange friendship. One average trip back to N.Y.C, she surprised Jeffrey with a six foot by six-foot oil painting of her and I lying nude in a ying and yang position facing each other. Although we were soliciting each other with sexual innuendo the picture was still very carefully orchestrated to perfectly portray the darker side of Jeffrey's thrills. It was an amazing piece of work, besides the lewdness of it, but she would've known that's exactly what kind of art Jeffrey liked. He was so astounded by her gift as he had previously asked her to construct a small painting of us together but was not expecting anything of this grand magnitude she had presented him with. He lifted her from the ground and twirled her around before he thanked her profusely and embellished her with his profound gratitude, the only thing Jeffrey had to offer, he handed her a small wad of cash as her payment. It was the most appreciation I had ever

seen him show a girl. Obviously moved by her gesture, he got her an exhibit in N.Y.C's "Metropolitan Museum of Art" where she submitted her very own piece. She sculpted an image of my headshot out of clay, shaping it with the strands of my long hair blowing across my face. I was taken aback myself at her creation. She really did have an amazing talent if not for her meaner streak she would've been a great friend. I will never forget Rena, for all of the ups and the downs we endured together.

It wasn't too much longer before I finally had enough of the abuse in the bedroom and I had to tell Jeffrey what I was feeling. She was getting even more violent as time went on, and with her questioning me and Jeffrey why she didn't get brought on long trips with him, she didn't get the fact that she was just a tool for him to use. Jeffrey said he was already thinking about getting rid of her off of his "regular list". He said she was becoming too clingy and he didn't like clinginess or jealousy. I never even got to say good-bye or take the opportunity to keep her as a friend, like a girlfriend to catch up with once and awhile, but that's how it was with Jeffrey, one day you sat under the blanket of his comfortably and the next without any warning you could be discarded like yesterdays news. She would've taken it hard but that's the game we were playing and it was for those who knew what lines not to cross.

I was further surprised the next day when Jeffrey gave me a thousand dollars to go shopping in downtown Manhattan to find a classy dress, on top of being sent to the exclusive beauty salon of celebrity stylist "Frederic Fekkai" for a new look. It was amazing, to be pampered like royalty. I walked out of there feeling like I had replaced a young girl with a young woman, I felt beautiful. He had yet another surprise in store for me. Ghislane called me and told me I need to go to a photo-developing store and ask them for two I.D photos then bring them downtown to Jeffrey's Manhattan office. Weird request I thought. I was more used to posing in full body shots being sexually exposed as a gift for Jeffrey. I did as they asked and took my two photos into the office where Jeffrey's assistant was waiting for my arrival. Still not telling me what the headshots were for, she took them from me and told me to have a seat for a second. A moment later I heard Jeffrey call me into the office. "I like what you've done with your hair, you've gone more blonde, suits your glowing tan". I replied with an appreciative "thank-you" for sending me to such a renowned hairstylist, and shopping money. I showed him my finds for the day, an elegant off the shoulder navy blue dress that had two layers that would swoosh and sway with my every stride. I couldn't wait to wear it on a special occasion, and I wouldn't have to. The pictures I had to bring to him, as he would proceed to tell me, were for my first passport. I was so excited, we were going to France for a close friend of Jeffrey and Ghislane's birthday party, famed super-model Naomi

Campbell. I was so over-joyed with excitement, what girl my age with a background like mine was attending socialite parties and globetrotting the world. It only made it harder for me to see beyond the elusive walls I had put up to protect myself from the appalling truth.

We left in early April first going to London, Paris and then our final destination being St. Tropez in Southern France. If Hallmark had a postcard, St. Tropez would definitely be on the front of it. It was beautiful spring weather and every where you looked women were dressed in bikini tops branded with some kind of designer label embedded into it and the men were following them around like harping dogs in heat. In all of the elegance of the Mediterranean, "La Bastide De St. Tropez" was an impressive landmark. Jeffrey and Ghislane were staying in one of the private cottages, on the park on the grounds, while Emmy and I stayed in separate quarters inside the hotel. The old style cobblestone streets were lined with boutique shops and beauty parlors. It was the hedonistic stomping grounds of the beyond rich and famous.

The next day we went out to lunch at the grand opening of the infamous Nikki Beach Club, where a cheap glass of champagne costs around two hundred dollars and if your not keeping the alcohol consumption flowing like water, you'd be asked to leave to make way for the constant flow of prospectus patrons. That's where I first got to meet Naomi Campbell. She was wearing the typical attire strutting around southern France, a D&G bikini top and a wrap around mini skirt to go over the swimsuits bikini. She was so tall and stunningly beautiful. Her charisma was energetic, funny, and everyone seemed to hang off of her every word and laugh at her every joke. Ghislane and Jeffrey kissed her cheeks and wished her a happy birthday, and then I was introduced and followed in their suit. She was surrounded by a league of assistants, friends and fans, which didn't make it easy for us to all converse but she got enough time in to invite us abroad a yacht of a fellow she was "kind of seeing" at the time for the before party ahead of tonight's event. We went back to the hotel and I gave Jeffrey a massage in his room before we all headed down to the pool to soak in some of the year's first sun's rays.

I loved wearing my new ball gown and feeling like a princess. It was absolutely sensational and made me feel as if I floated in the dress. I swept up my long hair in a twisted clip, only letting down a few curly strands and layered on the mascara. Receiving many compliments throughout the evening when we eventually left the Yacht to make our appearance at the main birthday bash, I couldn't help but feel excitement for the party to come it was the first celebrity birthday bash I had ever been to. Being introduced to model after model and the rich men that followed them around became dizzying. Jeffrey sat back and watched as I buoyantly worked the dance floor, coming back to the table where he

was, only to grab another glass of champagne every now and then. Every so often he'd introduce to me to someone new, pulling me aside to show off his eager young masseuse to his fellow pedo's. These people had so much money pouring out of them. I don't know why he even thought they'd care in the first place. It made me feel good though. At least I knew I made him proud to have me in his company.

Being surrounded by so many of Jeffrey's colleagues and his likeminded people that were considered the most sophisticated and the highly esteemed of today's world nearly made the way I was living lately more fathomable, at least to myself. I thought if everyone looks up to these people and they are all accepting of it, it must be just the way the world turns. I danced with a young prince that night and with all of the help from the bubbly champagne I couldn't remember his name for the life of me. On one of my trips back to the table for another glass, Jeffrey leaned over to quietly whisper in my ear that it was a prince that I had actually been dancing with and I didn't phase me in the least way. I went back to the dance floor and continued to let my hair down. It was a fun bash, the entire crowd sang "Happy Birthday" to Naomi and by the time we got back in the car to retreat for the night, I was giddy from the drinking and dancing all evening. We had a guest in the car, and apparently we had already been introduced, but I couldn't even remember his name in the first five minutes of our meeting again. He was the hotel owner of some large chain in America called "Hilton". Staying at one of the cottages near Jeffrey, he saw it quaint to loan me out for a night's massage to ruin an "almost" perfect evening. Jeffrey told me to come back to his room after I was finished with Rick, thankfully he reminded me of his name but also odd I thought, being so late I would've never imagined Jeffrey could stay up this late but I never made a fuss out of his requests. I gave him affirmation of my understood instructions and headed off with this stranger into the darkness.

I dimmed the bright lights in his bedroom to a softer tone as if it might aid the vision of this short, balding man with straggling remnants of curly brown hair left to show for the remaining bits of youth left in him. I had to ask him to undress and lay on top of the towel that I had picked up from the neatly folded pile at the end of his bed and spread it over the duvet. I didn't want to waste a second in his place, getting right to the very reason I was even there. Turning around while he was getting undressed, being our first time together, I wanted to give him the impression I was actually a therapist and not a finale to the end of the nights entertainment. Not exactly what he had in mind though, given that my impression was already made for me when Jeffrey arranged for our meeting in the first place. His chuckle to my response was condescending as he came up behind me and unzipped my dress which floated to the

bottom of the floor as he was saying "You can't really expect to give a massage wearing this, here sweetie, I'll help you out of it." He just wanted to see the hidden bounty my clothes were hindering his eyes from seeing. I just went about my way trying to get his hands off of me and to get him to lie down for a massage. Making quaint conversation with him was pointless as I was trying to send his thoughts elsewhere other than the apparent perverted schemes replaying in his mind from the heavy breathing he was making and the looks he was giving to me. I was using all of the tricks in the "turn-off" book even asking him about his wife and kids.

Unquestionably he was in seventh heaven turning every one of my distractions into another flattering compliment. He was saying things like "I love what you do you to me, I have never felt like this before, come stay with me and I will pay you double, no, triple whatever Jeffrey pays you!" Knowing he was just a drunk idiot, I wasn't being lured in by any of his offers of money or a privileged lifestyle, I knew these cages all too well and I was better off sticking with the one that I was at least accustomed to already. Holding back any composure now, he was going extremely wild ravishing at my body trying to tear off my panties like a hungered wild animal. After all of the champagne I had drunk that night it gave me the nerve that I needed to know exactly how to handle perverts like this one, who had been no different from every other shmuck in my life, and I quickly shut him up with a blowjob lasting no longer than two terrible minutes. It had only been shy of a half an hour before I was already getting quickly get dressed and hurrying out his cottage door.

When I got to Jeffrey's cottage I rushed through the door and told Jeffrey and Ghislane, who were sitting front of the fireplace reading a books, that I never ever wanted to see that guy ever again. When they asked me what was the matter, I told them of every thing that had happened that night even how he offered me to come work for him getting paid triple. I established a lot of trust with Jeffrey that night. He asked me why I didn't accept the offer and I responded with " Who would look after you, if I were gone?" Like a caring grand father would do, he pulled me into his chest for a hug and told me that it meant a lot to him. It was so late and I was so tired but I still had to give Jeffrey his massage that night. He asked me to just rub his feet as he fell asleep, and thankfully he was out like a light in no time. The next morning I took two headache tablets and a ginger ale instead of a coffee. Trying to contain my hangover as best as possible behind a pair of sunnies it was mid afternoon by the time I had felt like myself again. We spent the day Yacht hopping, soaking in the sunny weather while Jeffrey and Ghislane caught up with old acquaintances, Emmy and I were just accessories to look good on the arms of them. The next day we wrapped up the tail end of

our trip and commenced our flight back into the U.S. I was paid a generous amount and set off to go car shopping as soon as I got back to Florida. Through a private seller, I was able to pay out right for my car. I got a Dodge Dakota in cherry red, and immediately had an impressive sound system put in. She was my first pride and joy and taste of freedom. I would love to drive her down to Lakeworth Beach to sit in my car and watch the waves while I listened to my stereo blare music and puffed on a jay. Letting the rest of the world pass by while I sat back and watched them walk past wondering to myself what their story was about.

I turned seventeen that summer and had accumulated a string of exotic destinations that I had travelled in such a short time. I was given more make-up and a pair of diamond earrings from Jeffrey. Ghislane only wished me a happy day, wondering at times if she felt threatened by Jeffrey's and my closeness. We went to the island after we left N.Y.C and I asked If Sarah would be meeting us, mentioning it had been a while since we had last seen her. He said he had some bad news about her. Expecting the worse, thinking she had gotten hurt or something, I was astounded when Jeffrey told me that she had been sent to his island with one of his friends for a couple days and when the housekeepers were cleaning her room and they found a stash of cocaine left out carelessly in the bathroom.

He said he had no choice but to let her go. Addicts with no respect for themselves or his wishes had no leeway in Jeffrey's book. He didn't mind that I dabbled in drugs once in a while as long as I never brought them along with us on any trips, except for my Xanax, which he didn't mind because it was pharmaceutical and most of all wouldn't cause him trouble being a legal narcotic. Sarah took it too far when she crossed international borders with an illegal drug, risking her welfare and almost costing Jeffrey public attention. She lost her apartment and contacts in the acting world, only hearing from acquaintances once in a while that she was sinking deeper and deeper into the black hole of addiction. It was sad to find out, as I always did like her.

At the island, Ghislane had just recently obtained her helicopter pilot's license and wanted to get some practice airtime and flew Jeffrey and I to St. John where we picked up Alexandria Cousteau, the grand daughter to the inventor of the scuba tank and underwater explorer Jack Cousteau. Ghislane was out to set us affright in the air, but it was all talk, she was actually an impressive pilot. Still a daredevil though, she got her kicks out of hearing us fret on the earmuffs intercom's. Jeffrey made it clear that Alexandria was a guest when I was told to adhere to her if she wanted a massage, which I obliged her with several times during our first meeting. It was Jeffrey who instigated that her and I reenact as lovers in lesbian acts of foreplay and penetration. I couldn't imagine a girl with

such high prospects lowering herself to something of Jeffrey's standards, but I later found out through Jeffrey that he had donated money to her continuous exploration into marine life and habitats. She had followed in her family's footsteps, all of them involved in Marine Biology in some way or another. We actually got along really well, she was a real decent girl, and loved talking about her passion, everything underneath the waters surface.

When I wasn't busy giving massages to everyone around, her and I would hang out together. Often we go swimming in the crystal clear pool of ocean that the Caribbean had to offer. Once we swam out so far not paying attention to our location and were carried out to sea by the current. We took turns on the backs of each other, taking breaks against the strong ocean tide. It was almost a possibility that we nearly drowned out there, if it weren't for some guys on a boat out fishing for the day when they caught us in their view. They picked us up and brought us back to the island where we were reprimanded by a worried Jeffrey and Ghislane to first of all let someone know where we are going at all times, and never to lose sight of the shore while out for a swim. After that learning experience I took their heed and proceeded with caution. I had a newfound respect for the ocean and it's mysteries.

Having such a lover of the water as a guest, made Jeffrey want to explore parts of his Caribbean he had never seen before. The next morning we were met by a scuba instructor in St. James and given a few lessons in how to use the gear and more tips like how to descend slowly to the ocean floor as not to cause blood clots as well as visual hand signals to communicate underwater. It was so exhilarating beneath the waters surface. No voices to listen too, only the enchanting sights to take in. We explored the surrounding reef and found a large squid, many of sea urchins, and the magnificent colored coral that housed a many of the rich variety of the local species of fish. It was such a great sight to take in. Holding a permanent mental picture of those adventures to carry in my head for all times.

We all had such a great time that Jeffrey hired the same scuba instructor to come out the next day to scuba dive the safer parts around his island. We got bored quickly with not much to see but seaweed and a fish here and there. It didn't take long before Ghislane decided for us all to explore other numerous locations by boat, Jeffrey needed a bit of convincing at first and the instructor was quick to assure him that he knew his way well around these waters, of course he would say that, he was getting paid a hell of a lot to do this in the first place, why not extend it a few more hours?

The clear water glistened and the tropical array of marine life was on display as we wanted to stop at so many places but you could see as

beautiful as it was it could be as equally dangerous. It took so long as we had to veer away from so many desirable spots. Finally we found a good place that the scuba instructor thought was safe. He buddied us up into pairs and we jumped off the back of the boat into the crystal aqua blue waters beginning our descent slowly into the darker regions of the oceans floor. We were situated on open water with a cavern of reefs to venture in and around down below. It seemed to be quite a choice to scuba in, one that our guide said he wasn't familiar with but to alleviate his bored clientele deemed safe to swim around.

It was Jeffrey and the Guide together, Ghislane and Emmy, and I was paired up with Alexandria. Miles, the houseman, came with us and stayed on the boat just in case something went wrong and lucky he did. We were all too far under the water to hear his alarming screams of distress when shadow's lurking in the murky distance started appearing closer and closer. Ghislane actually looked frightened for once as she gave us the signal to start ascending upwards, reminding us by holding her ears not to go up to quick or as we were previously warned before we could pop a blood vessel in our brain and hemorrhage to death, not a very lovely image but neither was getting torn apart by sharks.Those giant shadows became clearer and soon enough we could recognize their indistinct species as the terrifying and more aggressive breed of sharks, the hammerhead. Grabbing Miles hand I was the last one ahead of the Guide to get on the boat imaging the worst as I waited behind Emmy and Alexandria who were the next to follow after Jeffrey and Ghislane I was in too much shock to scream or cry, I just told myself I had to stay calm to get out of this alive. Unlucky for us we found out later on that we were in their breeding territory and being sent a clear message that we were soon to be on the menu to their feeding frenzy.

We all felt like we had cheated death and I know it wasn't only my heart that was still beating out of my chest when we headed back to Jeffrey's island. Jeffrey was pale as his designer sheets and looked like he had aged another ten years in such a scared state. Ghislane took the heat off herself even barely taking a notice of beforehand and decided to poke fun at all of us frantically scurrying to get out of the water, it was just her nature, as I had never seen her move so quickly either. We got back to the island and all collapsed our fatigued bodies in our own beds for a long nap. Freshened up and much more relaxed we regaled our horrendous story again over dinner, this time in laughter. The following afternoon Ghislane piloted us all in the helicopter to St. John's Airport and we said good-bye to Alexandra where we all parted ways. I met her a few more separate times in Palm Beach at Jeffrey's Mansion, but she wasn't a regular of his, probably not as easy as the troubled girls were to bribe.

Chapter 11

Throughout the remainder of the quickly passing year I was on a constant move with Jeffrey. Attending various dinner parties, mostly with other esteemed billionaires and widely acclaimed scientists. Jeffrey likes to surround himself with the most brilliant and powerful of minds, filling his little black book with some of the most esteemed and even infamous people in today's wealthy society. It was during those intellectual gatherings that my body was also put on the banquet menu but this time for a powerful senator George Mitchell and another prominent Nobel-Prize winning scientist who's name would be mentioned but for all the life of me can no longer remember. They would be only some of the recognizable figures of the high society that became added to my list of clientele, of course being introduced to for a lot more than just a client of massage.

As an amusement to Jeffrey's associates I also knew my place was to entertain but not to every desired content. I was to show them a good time but not the way I would have to use technique and effort for Jeffrey. The very teachings from Jeffrey himself, or my tutor, as he liked to so eloquently put it. Consistently being used and adored for the likeliness of my youthful looks I was becoming very accustomed to my lifestyle with Jeffrey, never really relaxing into it, but just accepting this as being as good as it will ever get for me. I didn't think I should be complaining, wasn't I being offered a life in exchange for servitude? Just letting the signs of my anxiety and depression pass me by while I blanketed them with my pills, suffocating under a blanket of pain is all I was really doing.

I spent Christmas and the New Years holidays with Jeffrey in N.Y.C, who doesn't celebrate the occasion, as he is of Jewish descent. Not that he was a religious man anyways, I never even saw him celebrate Hanukah either. We firstly stayed at his ranch in Santa Fe for a week, then left for a long plane trip to Paris, France where we all suffered jet lag for the next twenty four hours. We all stayed in a grand hotel with a view the Champs' Elyse.

Emmy and I shared a room and with her gifted ability to make new contacts in just a few hours, she brought out a jay to share on the rooftop at nighttime while we were overlooking the lit up Eiffel Tower. We never got really close as buddies but we both knew what we were indebted to and felt each other's sorrows. All four of us went out shopping at Chanel, D&G, Ralph Lauren, and many other little exclusive boutiques the following afternoon. As a gift Jeffrey bought me a white terry clothed goose feathered sofa and had it sent back to my apartment in Florida, and bought some new tapestries to have sent back to Santa Fe for his ranch.

We also visited his up and coming Paris apartment. It was a modern, typical flat being refurbished, and we went to see how it was all looking. Jeffrey liked to fuss about every detail and harass the builder's about their work, changing last minute details at a whim.

Days and many croissants later we left for Spain feeling bloated and sleepy. We only stayed in Spain for the afternoon, going to see another astounding Moroccan castle for Jeffrey to replicate at one of his many mansions. It was only a short plane ride to Tangier, Africa for more castles hopping. We arrived at the historic landmark and the only five star hotel in Tangier called El Minzah in the village of Ville Nouvelle. The city and outskirts were still very hostile at the time, females being warned to not walk the streets alone and not to leave the house after dark or be at risk of being raped or worse.

When we got to the room, it was oozing with every expected bit of extravagance that a luxurious historical palace should offer until I was greeted with a pile of monkey poo in the very middle of my bed. Not a happy camper I called Jeffrey, Ghislane and Emmy into my adjoining room and they all had quite a good laugh at my expense. Within a moments notice of a complaint call to the front desk and we had an attendant cleaning up my bed linen. The cleaner noticed the window was still opened, he warned not to leave it ajar at nighttime just in case another monkey wanted to make himself comfortable in my quarters.

Ghislane joked that maybe I should keep it open I might find a suitable husband before I get any older. Always the instigator of a good joke but unable to take one herself she didn't like when I poked back that it was more in her recent taste of men, since she loved to brag about her rendezvous with her various lovers. Once she came back giddy as a schoolgirl with an explosion of news, with all the build up and excitement in her voice you'd think she was the next crown princess, but she had given George Clooney a blowjob in the bathroom at some random event, she never let that one down.

We all went to explore the towns surrounding Moroccan castles and meet their royalty that lived in them. Jeffrey's personal interior designer's met us at the residences. They walked around hurriedly, scribbling notes into their clipboards and whispering between themselves. The palaces were historically unique and beautiful but I wondered how could they live so grandeur behind these walls when they lived in a city of such poverty stricken squabble. Beggars lined the streets, people could just go missing and no one could care less, and you heard of barbaric murders happening every night. Against the advice of the Palace Attendant and Jeffrey's wishes, I decided to take a stroll one afternoon, mainly just to take photos of exotic Africa and do some shopping in the village markets but I ended up being intrigued by a group of young children playing in the streets.

When I was noticed watching them, about fifteen of them came up to me and began to beg for money and food. I was over taken by the poor, hungry children and I felt sad for them all and wished I could help out somehow. When the tide of kids washed away and the street went empty, I was overcome with intrigue at these two little boys. Brothers I found out later on, and there only toy was an empty can they were kicking to each other in the middle of the street. Intelligent kids, they were able to speak three different languages, including English and I was interested to ask them about life here. They didn't seem to notice or be bothered by their poverty stricken lives. They told me about their school and parents and I thought I had just heard the saddest story ever but they were accustomed to living like that like I had been so accustomed to my degrading lifestyle for so long.

I was compelled to empty out the contents of my purse, giving them over two thousand dollars in U.S currency. A passer-byer snapped a photo of the kids and me for myself to take home as a personal souvenir before they rushed home to proudly show there parents the money. I told Jeffrey later on of my good deed and he couldn't believe I'd give away my money so carelessly. He told me I had set up their parents with enough money to feed and shelter their family for a year. Wasn't that a good thing? I couldn't believe it, not that I was well off or anything close too it, but to realize how lucky I was and to not have compassion for the lesser off, especially children of a third- world country, I wouldn't be human anymore. Then again what did I expect from someone who could numerously steal another man's daughter for the use of his own sexual pleasure with great ease.

We went out to lunch the following day with Jeffrey's team of designers to wrap things up and after Jeffrey's afternoon massage he went to the palace to have a nap. When I was all alone I thought I'd go see the culture of the local unique markets again and this time buy some trinkets to bring home. I got to sightseeing and took pictures of the legs of lamb hung over the blood drenched doorway over people's homes as to warn off evil spirits and the ghettos where the local villager's called home. I walked into many of the market's stalls and saw the most peculiar antiques, such as weaponry with the blood of it's last victim stained on it's sharp blades and body pieces of various animal's for the use of religious sacrifices. I was more interested in the different culture and respecting their ancient way of life with interest, instead of squirming like a tourist and getting grossed out. I thought it was so educational and enthralling in fact, I ended up buying a few sacrificial trinkets to have sent to my apartment in Palm Beach. Not to say that I wasn't looking forward to getting back to the luxuries of western civilization it was a bit like camping, fun and adventurous but as equally dangerous and thrilling.

When we left for the final destination of our trip I was looking forward to eating normal food again, not one to stray for foreign dishes, I'm a more of a cheeseburger and pizza kind of girl, a true sign of my American heritage.

We landed at the Heathrow Int'l Airport and greeted by a driver that would take us to Ghislane's town house in London's central that Jeffrey had recently bought and refurbished as a gift for her. Emmy said "Good-Bye" at the airport, leaving us to go to her hometown in the rural countryside nearby to visit family for a six-week holiday from work. It wasn't a very long drive before we were in the heart of the city and at Ghislane's place. I thought it was a cheery townhouse that had character and the historical pub in front of it and cobblestone streets only added a unique charm to its presence. They were going out for dinner and invited me along with them but seeing I was so exhausted from all the travelling and looking a bit melancholy, I apologetically declined going out for dinner that evening, I rather would be taking a few pills to catch up on some needed sleep. "Are you sure your Okay"? Ghislane asked as she showed me to my room, more considerate than she normally was but I assured her that I was in absolute good health, just tired from all of the recent jet lag. Without another word said she whisked off downstairs, to the car where Jeffrey was waiting for her.

I took the liberty to call my parents house to say "Hello" and catch up with them since I hadn't been home at all for the holiday season this year, always too busy working. They sounded really happy to hear from me and my mom put me on the phone to talk to my brothers as well. I got to tell them about my travels abroad and I had some cool tribal stuff from Africa that I bought for them. They sounded so proud of me, all of them, and why shouldn't they be? In everyone's convinced mind I was making great money, travelling the world, and meeting new faces everywhere I went, why should I spoil anyone's delusions, especially mine. I took my sleeping tablets and had a bath before falling into a deep and much needed sleep.

The next morning I was woken up by Ghislane who I could tell was in a chirpy mood by the way she paraded through my closed door saying "Wake-up sleepy head" and opened the window's shutters to let in the bright sunlight, she had never done anything like this before and I knew immediately something big was happening. She sat down on my bed as I rolled over from my deep slumber and I was able to mutter for an explanation as to why she was awake so early. "Besides the fact it is ten o'clock in the morning and nearly time for brunch, we have a big day planned out for you today." She was waiting for my cue to ask her "What are we doing", when I did, she responded with a convincing enthusiasm "We're going shopping for a new ensemble" she paused for a moment to

build the suspense, before completing her sentence " To go dancing with a Prince of England this evening". Hoping it would be one of the younger generations, I was disappointed when she told me he was the Duke of York, Charles's younger brother Andrew. I looked at her with a fake surprised look, one I had to use on many occasions in my time with them, to give an impression of excitement. "What…wow!" I exclaimed with my gifted acting ability. It is a sad realization but I had grown more accustomed to seeing people for their significance rather than the good qualities they possessed, and was able to grin & bear the thought of what I expected lay in store for me.

Ghislane and I left shortly thereafter for the many lanes of designer shops to choose from in London. Her pep talks to prepare me for my duties towards royalty went on and on, giving me the obscure impression I was something of importance, at least for more than an evening. "Make sure your bubbly and energetic, nobody want's a dead horse" was one of the cheap tools she instilled me with. "Who knows where this could lead for you" was another. As the day grew shorter my anxiety only heightened, anticipating the Prince's arrival and unable to decide on an outfit, I picked out three. Our last stop for the day was Burberry's for a nice handbag to compliment our chosen attire. We got back to her townhouse with still a couple hours spare to get ready. After trying on all three outfits and many mental debates with myself later, I decided on the pink mini-tee and dazzling pair of denims with horses embroidered into a pattern. It seemed a lot more my style and age group rather than the other two older looking sophisticated dresses I had picked out. I told myself I was going dancing at a club not to an opera. As most young girls can be during their body changes into womanhood, I felt awkward, you know, big feet, freckles and body hair in unwanted places. They're things you just don't want when your seventeen and then you see these iconic billboards of what femininity is supposed to represent and just don't fit into that picture, never feeling what we all are already… absolutely perfect. By the time I had got ready I was a nervous wreck, but trying to keep my cool on the outside was an act. I thought it'd be a good idea to take a few Xanax before the evening unraveled and my anxiety went through the roof.

Jeffrey and I were sitting in the lounge room downstairs, waiting for Ghislane to finish getting ready. The room was silent, only stillness in the air. I stared at the mural painted onto the wall that I was facing. It was an interesting piece of artwork. In great detail it illustrated a happy looking family sitting on a bench overlooking a pond that resided on a large piece of land with a beautiful home displayed. There were also hunting hounds and the hunters chasing a game of fox like the notorious "English Hunt Pieces" throughout history. Jeffrey took notice of my enchantment into

the picture and in a hushed voice proceeded to tell me that it was a portrait of Ghislane's childhood, the part she could be proud of. I never realized how prominent her family's history was in England, apparently as to Jeffrey's attest, her Father was born of poor Jewish decent in Czechoslovakia, most of his family being killed upon Nazi invasion in 1939. Fleeing to join the British Army as a young man, he changed his name a few times and made a lot of contacts in the field. After the war, a newfound Robert Maxwell went into publishing using his army contacts to establish a business initially built upon publishing scientific books from occupied Germany. In time, Maxwell acquired several British newspapers, among them the Daily Mirror, countering his wits against the likes of Rupert Murdoch along the way. However, whilst constructing his publishing empire, Maxwell compiled astronomical debts, and his equivocal financial dealings attracted the attention of governing authorities that judged him not to be looking out for his companies best interest and in the end it transpired that Robert Maxwell had been using proceeds from his employees pension funds to meet his financial debts, ruining the futures of thousands of employees. Once an esteemed Member of Parliament and publishing mogul, Robert's body was found floating in the Atlantic Ocean after he was found to be missing from his yacht, the Lady Ghislane (named after his favorite child), whilst cruising the Canary Islands in 1991. Jeffrey went on to tell me that when her Father died she was inconsolable, and in a very bad state. He picked her up from the trenches of despair and took her under his wing, and it's there she has stayed comfortable ever since. To Ghislane his peculiar need to have so many woman around and even his taste in younger than legal one's didn't seem unconventional to her. It was her own Father who was deemed a womanizer and even took a second wife whilst still married to Ghislane's mother. I would have never guessed this carefree, spirited, and vivacious woman had ever endured such sorrows. I couldn't help but look at her in a different light from then on, but not letting her know that I knew, to avoid any altercations between us.

Like clockwork Ghislane came downstairs five minutes before Prince Andrew were to arrive, wearing a tight-fitted white wooly turtleneck singlet and a nice pair of loose fitting trousers. Looking elegant and casual at the same time, a very hard look to achieve but one Ghislane had always easily mastered. They both seemed at ease poking fun at my obvious nervous state, just another ordinary night out for this extraordinary couple. The knock came at the door just after six o'clock in the evening. Ghislane greeted him and the guard who would wait for his return in the car. She led him down the hall to where Jeffrey and I were sitting. We both stood up and Jeffrey shook his hand, while Ghislane proceeded to introduce me and as I was taught by her was English

custom, we both kissed on the check. We all sat down on the lounges for some tea and biscuits while conversing idle chitchat. By the sounds of it, Ghislane knew well of his recently divorced x-wife Fergie, whom they were all taking turns in slandering her for one reason or another. It was apparent there were some fresh wounds still lingering on and as good friends do, it was their way of helping him get over her. When his daughters were mentioned, Ghislane and Jeffrey treaded lightly, only speaking highly of them, and offering their sympathy to the young ones.

The conversation turned to a much lighter subject. Andrew wanted to know more about this young guest they had to join them out for dinner and dancing that evening and then the spotlight turned on me. I was more nervous than I had ever been before a night out with someone, probably the build-up Ghislane and Jeffrey had hyped this meeting up to be. To break the ice, she played her favorite guessing game…"how old do you think Jenna is"? When Andrew guessed correctly, I was seventeen years old, she was surprised, thinking I could have passed for younger. "I guess we are going to have to trade you in soon" she laughed, always the first one to throw in her quick-witted two bits, all of them chuckling along with her. Hardly a laugh at all, unknown to me at the time his eldest daughter is only five years my junior. I was finding it hard to make much conversation in the beginning, just laughing when the occasion called for it, and keeping up with Andrew's constant glances in my direction, was all I could manage.

The restaurant was a close drive for us with Andrew, his two guards and his driver following behind us. I was seated next to the Prince for dinner and Ghislane and Jeffrey next to each other, an evening pre-ordained. I was supposed to flatter him with compliments and dote on his every word spoken, but I didn't even do that for Jeffrey blatantly, it would've felt awkward to act like a bimbo for him. Instead I remained calm, cool, and collected, hoping that my nervousness wouldn't spill out at any given moment. The next place we were going was much more my style, and I found it easier to relax. We pulled up next to a Nightclub called "Tramp", a member's only nightclub, and one of the most exclusive haunts in the world for the rich and famous to be seen for the last forty or so years since it's doors first opened. Andrew's guards waited outside while we all went in to hit the dance floor. Jeffrey being the social introvert that he was found the first available empty seat in the corner but facing the dance floor to spend the evening watching everyone else have fun and Andrew went to the bar to grab us all drinks. He came back with sparkling water for Jeffrey and a cocktail for the rest of us, already knowing that Jeffrey never drank alcohol. We downed our glasses and made our way to the crowded dance floor, where I had the Prince's upmost attention. Moving his hands across the curves of my body, not to shy away from the fact

that he was in public, he was whispering sweet nothings into my ear and kissing my neck. I would just giggle not really knowing how to reply to an aging man with a bad smile and terrible moves, it would sound too much of a lie if I retaliated back about his swagger. He was the most incredibly hideous dancer I had ever seen and couldn't help but laughing on the dance floor and shooting glances of embarrassment to Jeffrey and Ghislane who were having a good time laughing at my expense…as the always did.

After an hour of pelvic smashing to the D.J's pumping mixes we finally exited the floor, his royal highness was dripping with sweat and ready to embark onto a quieter scene where he said we could be alone, not knowing that it had already been arranged for all of us to meet back at Ghislane's place but complied with his so called thoughtful request. I was so anxious about getting back to the townhouse, knowing what expectations I would have to not only have meet but also exceed in this case. Ghislane and Jeffrey seemed impressed at my attempts to entertain his royal highness, so far giving him exactly what he wanted the impression that I idolized him. They told me that he really liked me and was having a great time, so far tonight. When we got to the townhouse, his guards walked him to the door, staying to wait outside in the car. Ghislane met him and brought him upstairs where Jeffrey and I were in the study. We all chatted in the hall for a few minutes and I was able to have Jeffrey snap a photo of us together, one that would cause much controversy for the Buckingham Palace in many years to come. The conversation didn't linger on much longer before Jeffrey and Ghislane dispersed downstairs together, leaving me to my own sort of royal duties. They walked away giddy as if they were teenagers imposing on young lovers about to embark on a romantic evening.

Next to the study was the bathroom where I led him to next. The room was dimly lit masking the light from showing the disparity in my eyes. It was a beige marble tiled floor with porcelain Victorian style bathtub in the middle of the room and nowhere near the size of Jeffrey's residences. I turned on the taps for the tub and the heat from the water began to steam up the small room. On the basin were aromatic oils, lotions and soaps, loving the scent of floral notes, I poured in the lavender bath oil. Trying to do the best of my youthfulness to try and act seductive, I gradually began to strip off my clothing, piece by piece. Giving him time to savor the moment to come. He loved every second of it as I went over to where he was waiting and watching, then began to undress him at a much quicker pace. We kissed and touched each other before submersing into the hot water, where we both continued to reenact foreplay. He was adorning my young body, particularly my feet, caressing my toes and licking my arches. That was definitely a first for me and I couldn't help

but laugh, I hoped he didn't expect the same treatment back. Through my recent experiences with Rena, I drew a line with extreme fetishes, especially ones that would involve my tongue and feet in the same sentence. It wasn't hard to get him wound up to the point where he just wanted to have the rest of me so we dried off from the cold and retired to my bedchambers for the longest ten minutes of my life. Moments later and without any real emotional attachment, he burst in ecstasy, leaving me to my own feelings of dismay. As relieved as I was to see the experience come to pass with him, it was finally sinking in that I would never be anything more than but a muse. Still trying to ascertain a surreal dream a young girl once held but no longer the same girl I was no longer sure that the dream was even real anymore. In the whirlwind thrown together by wealth, power, and privilege I was but a grain of sand and felt helpless down the road I was naively being led down. When the real picture was unveiled, later in my life, I had nothing but memories filled with sorrow to remember of my teenage years.

Jeffrey, Ghislane, and I left for the states to conclude our long journey home to the U.S.A. I was so happy when we landed on our soil and called T.J from my cell phone to see if he'd meet me at the airport instead of going back to Jeffrey's, he'd be there within twenty minutes, he was so happy to hear my voice and that I was back in town. So ecstatic to be getting away from my life of servitude for the next few days, I was sourly disappointed when I got off the phone. As if he'd been listening to my entire conversation, Jeffrey told me he'd like a massage back at his place and he could pay me at the same time for my trip with him. With much dismay I had to call T.J back and cancel the arrangements, I wouldn't see him until later that night, in which one of Jeffrey's staff would drive me home and I would be too exhausted to do anything.

Chapter 12

When we got back to Jeffrey's mansion in Palm Beach he wanted to thank me for showing his friend, the Prince, such a good time. Rewarding my diligence with an extra sum of money and luring me deeper into his goal of keeping me at his side as his personal amusement that he could lend out at anytime. Further proving his capability of using the vulnerable impressions of a young girl to influence and intimidate his fellow peers of

like minds. Jeffrey didn't want to know the grim details of how it all happened on my intimate night with the Prince, he just asked simply if I thought that I did well in keeping his friend happy. Knowing already that the evaluation of my performance I gave was already discussed between them, I just as simply replied back with a nod of approval. Though I did have a laugh with Jeffrey about the Prince's weird fixation on my feet and lets just say that he was quite tickled with Andrew's quirky obsession, having a good ol'chuckle at my eccentric encounter. I was paid extremely well this time, putting my money earned into nothing but popping pills and alcohol by shouting my so called friends a good time, aiming for the attempt to forget about my experiences abroad. I partied like that to feel young again, my age and most of all to self-anesthetize my troubles from within. It wasn't like I was waiting for someone to arrive on his white horse and take me away to a magical world. I simply yearned for more out of life than being someone's replaceable amusement. Still a romantic at heart I would often get lost in my daydreams, imagining a new beginning with a strong man that would show me an enduring love, safety in his arms, and a lifetime friendship. Though the suggestion of true loves existence was only a dream for now, something I could only read about in novelistic fairytales but the passing thought from time to time was warmly envisioned. With my inner most desires being locked away in a deep crevice of my heart, I knew my romantic notions would be absurd in Jeffrey's eyes. For some unknown reason to me he couldn't allow himself to give love or receive someone's heart in return. Once he said to me when I asked him if he ever thought he would settle down and find Mrs. Right and he told me he didn't believe that love with one monogamous partner was possible but he found that love with many was. I thought at the time it had something to do with having so much money and everyone wanting him for that instead of seeing him as a person and even felt bad for him, but now I can understand from his recent lessons unlearned that it was a simple equation of his twisted perversion to become infatuated with the vulnerable youth off the streets. Spending so much time in the entrapment of Jeffrey's embrace, I was becoming numb to the feelings and aspiration to ever climb above this deep hole I had dug myself into. I knew I wanted to escape from this bizarre form of first class slavery but I still didn't have the tools necessary to help me get out. How could I have? Everyone that knew me believed I was living this enchanting life, a rags to riches success story that most people dream of, only I knew the price to be paid for all of this and I was the only one who could pay for it.
Underestimating my true self, I was settled by Jeffrey's side for now considering him to be someone to look up to, my mentor. Such a

complicated battle within myself, it is one I still ache to fully comprehend today.

Sunny spring days melted away the ice off the frozen streets of New York and the harsh winter winds begun to gently blow away the dead leaves, making the caged trees appear to have some form of life again. I hated the cold winters there, it would only add to my depression being locked indoors. Give me hot Florida days blistering in the sun where I can swelter by a cool pool and sip cocktails with pieces of fruit and little oriental umbrella's floating around. What a vision of solace? Looking around my extravagantly decorated mid-evil room I was reminded of the desolation that I was more than accustomed too. Knowing it wouldn't be long before I was summoned again for another ritualistic occurrence in fornicating with my master, I hardly bothered to leave my assigned chambers, scarcely being sent home for a moments break, I just accepted my fate. As I predicted the intercom buzzed momentarily and I heard Ghislane's voice come over and request to meet them in Jeffrey's study. Not an odd call, I would often meet him there first so he could tie up some unfinished business before heading to the dungeon, or what was thought to be the massage room. Making my way down the hall, I had an eerie feeling wash over me, as if I had several pairs of eyes on me, watching my every move. A cold chill moved up my spine and I had to move my thoughts elsewhere, too easy behind these walls to succumb to my fearsome anxieties. I punched in number one once inside the elevator and it took me down to the floor where Jeffrey and his surprise guest were waiting with anticipation behind closed doors. I cracked open the heavy wooden doors and a familiar face revealed itself. Definitely not expected or pre-warned on my part but I already knew what he was here for or at least why I was called down to the study. Prince Andrew had that notorious cheesy grin slapped over his face, as he looked me up and down like a shiny new car on display and he was about to take it for a test drive. Ghislane led me to the decadent sofa he was lounging on and twirled me around to give him a good lookover before sitting me down on his lap. Like a show pony I knew exactly how they wanted me to be paraded around, with the last of my dignity long lost, I had nothing more to lose. It was easy to give them the reaction they desired, all I had too do was pretend to be entertained by their lewd gestures, and when Andrew cupped my breast with a doll made in his image, I only giggled away. Ghislane wanted to take a picture of the bizarre scene and even got Johanna, another one of Jeffrey's so-called personal assistants, to come sit on his other knee for the snapshot, giving the impression girls couldn't stay away from Randy Andy.

Many crude jokes later and I was asked to show Andrew to the upstairs massage room. I'm sure he already knew where it was from previous

encounters with Jeffrey's "staff" but I led the way anyways, as if he was now my guest of honor. Entering into the dim room it took a few minutes for my eyes to adjust to the darkness, but knowing my way around the room was enough to find the shower. I turned on the steam room and began to undress myself. Andrew followed my lead and disrobed, throwing his attire to the floor. I wanted to run and hide feeling his hands touch me again, but my servitude for Jeffrey kept me there. Getting out of his stronghold I turned my attention to the steam filling up and tried to turn his attention to the marble bench where I suggested he take a seat while I rubbed his feet. By the look in his eyes I knew he could care less about a foot massage, his real desires were being shown by the arousal his body was forming. He indicated where he wanted me to touch him and how. I fulfilled his seedy requests, but only just. There was no pleasure in this for me, the only thing I derived from this event was to sink further into my slumber of depression. I couldn't remember a time when I felt needed for anything other than my body or amusements thereof. After his massage was thoroughly conducted I couldn't wait to get back to my room for another shower. Sitting on the floor of the shower under the harsh spray of water, I scrubbed my body where he touched me. Feeling abhorrent and ashamed what I had become, I let the water wash away the grime.

As the days progressed into nights and the nights followed a trail of destructive months, my outlook on life had diminished into utter sadness. I had lost my spark and my ability to look like I could handle the abusive state of affairs I had drifted into. Sinking deeper in the euphoric state of being on coke and pills, not only was my mentality dwindling away but also my looks. I sure as hell didn't feel like a seventeen year old anymore and now I wasn't looking like one. My eyes had dark circles underneath them from not sleeping and my bones protruded from my skinny waistline and chest. This made Jeffrey apprehensive in keeping me around as often and before I had a moments notice, I was out of money and looking for a job. When I questioned him what was happening, he told me I wasn't the same girl he had first met some time ago now and looked like I needed a break from working so much. " I'll call you next time I'm in town" was the last thing he said to me.

Chapter 13

Going back to an average teenagers life was more of a harder transition than I would've ever thought. Jeffrey stopped paying my expensive rent and I was forced to get off the drugs and look for a real job to feed and shelter T.J and I. It was much harder than it sounded, but I was craving

this in every possible way. Even though a week's wages for working a full-time job as a waitress didn't come close to the money I had made in a couple hours of working for Jeffrey, I was happier than I had been in a long time. I made some friends at my new job and found my duties to be easy and pleasant. I was good at making customers smile and keeping them happy becoming the waitress that made the most tips for the night, which in turn made my co-workers happy since we'd all split the tips at the end of the week. For the first time in a long time I had boys my age hitting onto me, and not that I was ever taken aback by there attempts but it reminded me of how it felt to be around a younger crowd. I missed so much of what I couldn't get back and the more I tasted it, the more I remembered how to smile. The relationship between T.J and I began to falter in a way that was beyond reconciliation. Fights became physical and I saw sides to him that only pushed me away more. He refused to look for work to help pay bills and he became utterly frustrated not having his usual cocktail of assorted drugs to keep him from feeling anything at all. He didn't like the fact I was growing inside and thinking beyond his elusive world. I had gone through too much to accept another form of abuse and degradation. Making that point very clear to him by kicking him out of my apartment back to live with his parents, I felt liberated like never before. I kept up with my rent and cleaned my act up. Enrolling in a yoga course and keeping my focus on staying fit and healthy became my only source of enjoyment. I was free and living for myself.

While out doing the grocery shopping one evening I couldn't help but stop at the local pet store and fell in love with a furry pooch. She was a Japanese Chow-Chow and a bundle of fur that more resembled a baby brown bear than a dog. I took her home with me and instantly she became my best friend. We went for several walks a day and she bore the brunt of many tear filled conversations, she was my loyal companion who understood more than anyone had before, all I really need was someone to listen and funny enough it was her that filled that hole.

Nearly three months had gone by and not a word from Jeffrey or Ghislane. With T.J out of the picture now too all I had to concentrate on was work, my parents and brothers, and of course my dog, Mary-Jane. I was going to family night dinners and bon fires again. My older brother was getting married to an amazing woman in a few weeks and I got to be apart of their beautiful ceremony. Small details of life's journey that I already missed so much of and now being able to smile at the simple things day in day out really seemed to put the real value of life into perspective for me. Everything seemed to be working out for itself and I was really happy, until he came back, T.J thought he'd come over my place one evening while I was sitting at home just watching TV.

Obviously mentally distorted from whatever choice of drugs he was smoking that night. He screamed down my apartment complex, going mad and scaring my neighbors I felt like I had no choice but to let him inside. I tried talking to him as a good friend would, just wanting him to see what he was doing to himself and what he had become. Part of me still loved him and took pity on watching him spiral downwards. Taking him back into my life was not a decision I made whole-heartedly, but was something I did out of guilt and what I thought was loyalty. He moved his clothes back to my place, which was all he ever owned anyways and we tried to pick up the broken pieces. T.J being still badly addicted to many drugs, I had to be very careful where I kept my jewelry and expensive items. I decided to rent out a space at a local spot and store my cherished items away, just taking the necessary precautions, I thought.

Still not working I knew how he was scraping by money and I didn't agree with it, T.J was a known thief and had been caught several times attempting to steal things, even as stupid as DVD's and PS2 or Xbox games from a local Blockbuster. He even stole from his parents, his sister and his brother and would probably steal a piece of candy from a five year old kid if he knew that it would get him his next fix. He hated the change in myself, realizing I couldn't be brought back down by his ways but knowing I still stuck by his side and defended him from anything that would hurt him wanting to believe that he still wanted show the bits of human nature left in his empty heart.

Unable to stand by and see me do well for myself he contemplated a way to try and bring me down. After a busy shift one night, he retaliated with another show of control. I had just finished cleaning up my area and setting out the tables to be ready for the next day when I went to the bar to hang up my apron and put my nights tips in the tip bowl on the counter by the beer tap. On one of his drug induced rampages he stormed into the restaurant where I was working and started to pick a fight with me. I knew he was off his face when he started accusing me of sleeping with my manager on shift that evening. Having no bias or ground to stand on in his attempt to make me look bad in front of everyone, I just laughed him off as a drunk idiot who needed to go home and sleep off the night's repercussions, although I was fuming inside that he embarrassed me but I still made excuses for him and told my boss I had to leave early to bring him home.

The bar was deserted as T.J waited alone for me slumped in a barstool and looking worse for wear. I had to go to the back of the restaurant and do some explaining to the manager on duty, I couldn't afford to lose my job over this incident. Surprisingly he was sympathetic towards my dilemma and even told me I could do a lot better than that schmuck, patting my back and telling me to have a couple days off. I punched out

and headed to my car with T.J in tow. For the rest of the night he was oddly quiet and asked to be dropped off at his parent's house, I was more than obliged to do so. I couldn't stand the sight of him let alone want to be around him tonight. Being so revved up it didn't yet dawn on me that something wasn't right. The next morning I was woken up by an alerting phone call, I had the manager from the restaurant where I worked, on the other end screaming at me and asking where the money is. I sat up in bed, completely awake now, and asked him back, "What are you talking about, what money?" His tone had calmed a bit and he could hear the earnestly in my voice and explained his accusations "The tip jar was empty after you had left last night and there was over a hundred and fifty dollars in there, now it's missing". The answer hit me instantly and I got a terrible knot in my stomach…T.J. When I left him at the bar not even thinking about the tip bowl to talk with the manager, he saw an opportunity to fund more drugs and he took it. That's why he didn't even want to come back to my apartment last night. It was all too clear for me now and I tried to explain to my manager about my boyfriend's sickness and asked him to take the lost money out of my wages. "I have no choice but to let you go and file a police report for the missing money". I couldn't believe what I was hearing. How did things turn upside down so quickly? I exclaimed "Even though I'm paying you from my pocket for money I didn't even steal and you've never even had any problems from me before?". His apologies were short and icy, nothing that could be done. I slammed down the receiver only to pick it up again to dial T.J's parents house and to no surprise he hadn't slept there last night and was not able to be reached. I felt like I was in a bad dream I couldn't wake up from and with no money to pay rent, eat, or even survive, I was back to the drawing board.

The week passed without hearing from T.J, he was in hiding, for now. When the phone rang early one morning I expected it to be him, instead it was a surprise phone call from a familiar voice. Jeffrey decided to give me a call to invite me over to his Palm Beach mansion for some lunch and to catch up, it really was just his way of finding out if I was cleaned up and ready to come back to work for him. With my life in chaos once again and having to borrow money off my parents for grocery food, I saw a quick solution to my situation and was even convinced this is what I had to do to take care of myself.

He greeted me at the door and led me inside. Ghislane was at her usual spot, her desk working away, and we headed past her with a quick wave and lip-synced a "Hello", not wanting to disturb her important sounding phone call. She glanced up quickly and gave a brisk wave my way, then put her attention back to the computer. Once we were inside the poolside cabana, which was Jeffrey's office, & gym, Jeffrey took a seat behind his

desk and told me to have a seat across from him. He took a sip of water from an already poured glass and asked if I'd like some. "Yes, Thank you" My reply was short and polite, already just wanting to get this meeting done and over with. His face was like steel and his expressions were stern, I felt like a child in trouble sitting in the principles office.

He cut straight to the chase wanting to know "Are you on drugs anymore?" There was a moment's pause as I took a deep breath and told him the entire truth. "I got really depressed for awhile and coped with my emotions by blanketing them with mind-altering substances. Just smoking a jay to relax wasn't good enough anymore. I needed to be high and flying to believe I was happy and dealing with all of life's curveballs. Snorting things like coke and popping amphetamines replaced my sorrows with an overflow of endorphins, making it possible to keep up with everything, until I would come down and the cycle just kept on repeating itself".

He listened to me continue to tell him about the good things that have come from the break. Like my dog, yoga, and working at a restaurant, making lots of new friends but most of all, I got my smile back, without the drugs this time. He was really happy to hear the upside of everything, but there was one thing I was reluctant to tell him about. My recent travail that T.J effortlessly caused at the restaurant where I was so happily employed. As my manager had warned he had to file a police report stating that after I had left, the tips were gone, putting the blame solely on me.

Giving Jeffrey a clear picture of the entire ordeal he exclaimed "What are you doing with this idiot Jenna, he is no good for you! I know you can do better for yourself, why do you let him drag you down every time?" Nodding my head in concurrence I went on to finish my epic drama. "I received a phone call from the PBCP asking me to come in about the money, I told them what happened over the phone but they still want me to come in. I don't want to have a record for something I never did or ever would do!" I put my face into my hands and covered the tears now trickling down my cheeks. "I just can't believe this is happening to me when everything has been going so uphill, now I'm out of work and in trouble" I wiped my face and looked up at him " What do I do?" Enabling him as my mentor once again, his sly grin said it all. Jeffrey normally hated when girls made waves in any way and this one would be considered a tsunami but this time it worked to his favor. He wanted me to come back to work for him, continuing my massage studies and I needed his help. In his eyes he was doing me a solid, which in return I would have to scratch more than his back for. Taking his time to contemplate what to respond back and what solution he could offer, I began to worry that maybe I shouldn't have done this.

Pulling a few tissues out of the box, he passed them across the desk to me. Trying to retract any damage done I said to him "I must look like such a mess to you and making you listen to my saga, I am so sorry… I shouldn't have come to you with all of this." He looked surprised and sympathetic "Quite the opposite actually. I'm glad you've come to me for help. I have got a lot of connections especially with the Palm Beach County Police Department. I give them regular hundred thousand dollar donations, and after I speak with them there will be nothing more to worry about. To be honest I'm more in shock about how much can happen to you in such a short time, your life is one big soap opera"

Now he was chuckling and trying to make light of my somber mood. Laughing along too I replied, " I know right? Drama just hangs around me like a bad smell". We did some more light-hearted catching up and went out to the poolside for some lunch and a swim, concluding the evening with an erotic massage upstairs. He paid me the usual two hundred dollars and asked me to come back tomorrow. "In the meantime I don't want you thinking about your sticky situation, consider it dealt with". His attempt to brighten my spirits had worked relieved about money and the police but now I owed myself to him feeling indebted to him more now than ever.

Chapter 14

As was promised I never heard back from the Police Department and Jeffrey had his favorite girl back by his side. We picked up where we left off ever better than before, I being entirely subservient to every sexual desire of his engaging myself in any role he wanted me to play. As he was getting older his appetite for sex never hazed, if anything it only increased. The orgies with other girls got larger in numbers and his appeal to younger girls, new toys and wilder nights expanded from once and awhile to quite an often occurrence in Jeffrey's company. I put it down his new friend and business investment, Jean-Luc Brunel.

A long time agent for young and upcoming models, Brunel, a French citizen, was known for roaming the world in search of young, naïve beauties living in poverty stricken countries and willing to do just about anything for money. He would procure them mostly from Clubs in South America and the Former Soviet Republic. Filling their heads with fairytales of America and large amounts of money, he would promise them all of the finer things in life, sometimes even throwing a pill in their drink, if that meant getting them in his bed was becoming too much of a task. What he wanted is what he got, which is why him and Jeffrey

ultimately became close pals and he invested one million dollars into Brunel's company. In return Jeffrey now had supply of girls on tap for him to choose from.

With the assistance of each other, Brunel obtaining the illegitimate visas for underage-overseas girls and Jeffrey housing them at his brother's apartment complex on 301 E 66th St, Manhattan, they were quite the team. Jeffrey and Brunel would charge them for rent, forcing them to work for them selling their bodies for money, nude pictures, and even pornography. These were what seemed like really nice people with not so nice intentions setting an impression of how the dignified wealth play and behind closed doors they had as much civilized manners as a barbaric chimpanzee in heat. Giving a girl a step-up in finances by teaching them there only worth is what lay between their legs, us girls all were the same in the end, regardless of what country we came from, what language we spoke or our cultural indifferences, we all were being used for one thing alone, our youthful looks and beautiful bodies.

Being Jeffrey's permanent sidekick, I would have to part-take in a many of the hedonistic exploitations that went on at one of his many residences, which meant having to be uninhibited with many girls my age and younger. Being complete strangers was hard enough but we couldn't even understand each other, speaking in different tongues we were expected to excel at preforming many acts of lovemaking and foreplay on each other, while being observed by a man in a corner jerking off. Not exactly what I would call an advantage in my stage of life, but in my head I was convinced we all had to do what we had to do to get on with life and if that meant doing all of this to keep Jeffrey happy, then I would do that.

It didn't take long in the accompaniment of Brunel for Jeffrey to hit an all time low, at least one that I knew about. Stupid enough or sick enough, I don't know which one it is or both but Jeffrey bragged about his birthday present from Brunel, once accepting three, twelve year old girls, sisters at that. He replayed the descriptive events with me telling me how they all massaged him and finished him off orally. He was so excited about the entire event, replaying over and over again over the next course of weeks how cute they were and how you could tell they were really young by the small amount of hair growth in their pubic region and non-existent breasts. A twelve year old, are you serious? I thought to myself. I still can't shake the feeling of disgust when I recall the look on his face as he told me time and time again of how his lust brought him to that profound low. He went on to tell me how Brunel bought them in Paris, France, from their parents. Offering them the usual sums of money, visas, and modeling career prospects was a bribe of the worst kind, they were just children. Laughing the whole way through, Jeffrey thought it was

absolutely brilliant how easily money seduced all walks of life…nothing or no one that couldn't be bought in his eyes. Behind the two of them followed a destructive trail of those in their path that were misused, violated, degraded in a variety of ways for one purpose… to satisfy the desires of the perversion that rotted their hearts.

The next couple of months I spent in Jeffrey's company, my life was revolved around him and his petty happiness. Arising to the occasion, I was no longer his teenage sidekick, I was growing into being a young woman and my body was blossoming like never before. Out of the awkward stages of my life, I now took to looking after myself like never before. Regular sessions in tanning beds and keeping fit became my life outside of Jeffrey. He kept telling me what a beautiful woman I was developing into and would offer suggestions to help me look good. Sending me to dentists for regular teeth whitening consultations or helping me choose my attire for the evening, he was ushering me into a whole new position, training me up for something else, but I was unsure of what that was.

Being a snotty little teenager was a girl of the past. Now I had to be his eloquent speaking, desirable to all and almost his personal porcelain doll. I went everywhere with him again, all of his eclectic dinner parties, conferences, and meetings with various members of parliament, famous celebrities, and other esteemed billionaires…most of whom lived by the same rule of thumb as Jeffrey did. Quite an alarming realization having to accept this world the way it is. Jeffrey knew all of the right people in this game, and trading girls for favors is how he kept in the circle. He was at the center of it all, blackmail being the only thing next to money with the ability to pull a many of strings, his conniving ulterior motive was to drag all that he could down to his pitiful state of mind. Inviting easily tempted acquaintances to his island or his other various residences he would bring out the assortment of young girls and pass them around like they were cocktails on a platter. No girl had a choice in whom they went with, only completing a task, we would have to charm and bedazzle these ageing fat men who other than paying for it would've never had a shot at getting to know a beautiful girl intimately. I personally belonging to Jeffrey rarely had to be loaned out and it was a big occasion, or should I say favor, if I was. I'll never really know what made me so important or special to Jeffrey, it definitely had nothing to do with love. I guess in the end I will always put it down to my capability of being whomever he wanted when he wanted, so compliant it just made it easy for him to have a personal toy at his constant disposal. All I can say is I lived in a jail with no bars, and in a country where slavery was supposedly abolished a long time ago but still existed right underneath everybody's noses. Myself and so many other girls were walking proof of it.

I still was given proper training in massage therapy from time to time, keeping me from looking back at being a teenager with no responsibilities to being a young adult with prospering titles. He knew I wanted to be self-sufficient so bad I would do anything for it and by giving me this dream to hold to only kept me in check. I looked forward to my training sessions, holding onto every word passed down to me and after the session was complete I would hurry back to my room and transfer the information into a workbook with associating exercises.

Trying my new moves on Jeffrey always impressed him, he would get excited hearing about my passion for knowledge and would tell me he could see it transfer into my massages, always giving it my all, my hands were a focused energy when I was at work. Using every ounce of strength to apply on a body, many were astounded in what I could do for being such a small girl, and Jeffrey loved it, using me for a two-hour massage "with benefits" sometimes being over twice a day. Ghislane would sometimes use me to massage her still but it wasn't as common, she preferred a man for that job.

Then would come the odd client here and there, of course set up by Jeffrey. Most of which were orchestrated to get beautiful girls comfortable and consequently naked then he would go in for the kill, so to speak, touching them intimately, in their most private of places like their vagina, breasts or anal. When he had us where he wanted, willing and able, then would come the toys, outfits and so on. A scheme he has used time and time again, telling those who know him well "he had never been turned down yet". It was starting to dawn on me how I wasn't getting any clientele that weren't used for Jeffrey's benefit and would make me wonder if I just wasn't good enough for that, but I kept quiet, never wanting to make waves like I had before.

To give me a break from it all as if Jeffrey didn't want to overload me again, he would send me away to his ranch for a few days, what he knew I considered being a small slice of heaven on earth. I'd spend my days roaming the hills, riding horses, and enjoying the solitude of my own company. One afternoon I was out exploring the land on Jeffrey's ranch which covered hundred's of acres with nothing but a bottle of water, my sketchbook and a small case of oil paint. I was on the search for something interesting to paint. A great pastime of mine, it made my soul quiet by creating beauty with my brush. I loved to recreate the images I saw on paper. I would paint anything beautiful that caught me eyes interest, from underwater scenes, animals to people and even fruit, I loved vibrant colors and emotion on display but my favorite soon became the landscape of the Santa Fe's rolling hills and earthly green and beige tones and in certain light it would illuminate into a golden shine. To grasp that feeling I was absolved in at the hardest of times became my greatest inner-

achievement, like taking a piece of that serenity and putting on paper for me to keep in my heart where it still is today, closing my eyes I am able to see it, being there anytime I need to. I was enjoying the heat and taking in the deserts sights when I stumbled off the track and into the wilderness. Exploring everything new to me was my second nature and never even entered my mind what would've happened if I went too far or got lost. I would rather face Mother Nature's wrath than humankind's any day!

After about an hour of drifting off track I came to a pile of rubble, looking like the remnants of an old pueblo made out of clay and rock. I picked up what looked like half of a clay bowl and noted that it had Indian designs etched into the side of it. Excited about my findings I decided to do some more exploring around the fields surrounding the historic site. I collected rare pieces of arrowheads, utensils, and parts of many broken bowls with artwork telling tales of their own. Time was of no essence here and before I even realized the sun had sunk deeper into the hills leaving me without any light to find my way back to the pathway. Feeling silly now after passing by a familiar looking boulder twice over, I was startled when I heard some poor animal become dinner for another, it's screams of agony only amplified louder and echoed in my ear drums, heightening the hairs on the back of my neck and making my heart beat nearly out of my chest.

I was lost and confused before but now I was petrified with fear. Taking me over three hours to find my way back to the path and in the direction of Jeffrey's mansion was a mission, so relieved in the end and so were the housemaids after I hadn't showed up for dinner, assuming I must've been out for one of my usual adventures. I went to bed strenuously exhausted that night and as I was falling asleep the phone rang, it was a call from Jeffrey who had been alerted of my disappearance. "What happened tonight, one of the maids called me to tell me you hadn't come back from your walk this evening" Detecting a tone of anger in his voice I tried to distract him by telling him of my findings and he scolded me for being gone for so long without anyone knowing where I was. Going back to the Indian remnants, I persisted on telling him what I had found. In the end he was just worried about me becoming a liability, but had to make it sound as if he cared. " Don't worry Jeffrey, I won't be doing that again. I can honestly say I have learned my lesson and the next time I want to explore I promise to take someone with me". I satisfied his worry of me being a future nuisance and with that I was finally able to tell him what I had discovered on my walk. He was impressed but did not sound surprised. "You must've been gone a long time if you found the old Indian pueblo's, just be careful you don't say anything about where you found the stuff on my property, it

could become a sight for historical preservation and that means the government could ultimately own my land."

I acknowledged his request and told them they were just a gift for my Mom, who was in love with Indians "Wait until she see's I brought her back real artifacts, she is going to totally freak out." He didn't mind that I was taking them. In fact he admired my curiosity and adventurous spirit. He reminded me that tomorrow was my last day. I would be driven to the Albuquerque International Airport the day after next, to meet Jeffrey in New York, for how long, only he knew. Giving Jeffrey many thanks for a great week, letting him know how much I appreciated these small breaks away, we then said goodnight. Hanging up the phone I had caught my second wind and set out to the kitchen to find a late-night snack. Raiding the fridge and pantry, I found some frozen pizzas and popcorn. I put on a movie and munched on the popcorn while the pizza cooked. Some 1980's dreadful alien flick got the better of me that night. It was based on a true story about people abductions from extraterrestrial beings, which were, like I was, visiting a remote area. I suddenly hated being alone on a ranch in the middle of nowhere. I munched down my burnt, crunchy pizza and became further enveloped in the thick plot. Leaving on the TV and the lights on that night, I spent my night tossing and turning, peeking through the small open crevices of the comforter, half expecting to see an alien being in my bedroom.

Living through the night was a relief and I laughed at myself in the morning, how spooked did I get? When I got to New York, Jeffrey, and Ghislane had a good laugh over my tale of survival in the wilderness and then the alien scare. "Your always having the best adventures" Ghislane exclaimed. We were similar in that way, both being s bit of free spirits it was really only her non-existence of moral standards that differentiated the two of us, in that way. "How do you know you weren't abducted and probed? I mean look at you and all that time alone on the ranch, what do you think Jeffrey, could she pass off as an alien?" Expectedly, Ghislane poked fun at me, her usual fun past time. Our relationship was an odd one, never threatened by each other but always precautious towards one another nonetheless able to crack a joke together, but when it came time to "work" it was no fun and games, she was intensely serious. "With a sense of humor like yours I would tend to think that you are the one from another planet." Just friendly banter between the two of us, then Jeffrey had to jump in with his two bits, "I think you might be onto something Ghislane." I squinted my eyes and gave them both an exaggerated death stare and pretended to grab my stomach in pain, "I think some things trying to get out of me", putting my fist in my shirt to reenact a scene from Alien, I fell onto the couch and faked my death. "I knew it" Ghislane shouted and jumped on me to begin tickling me all over and we

all broke out into laughter. It was those fun times that made me feel like we were all apart of this really perplexed family. We did everything together similar to normal families like eat dinner, watch TV, and travel it was only the hedonistic and corrupt side to these two deviates that made them a peculiar pair.

Getting turned on at the two of us playing together, Jeffrey came over to the couch we were on and pulled down his sweatpants revealing his erect manhood. All of the laughter stopped, now it was time for work. Pushing my head into his pubic region I had to give into his perverted wants. Ghislane started to undress me. Once I was bare she loved starting with my breasts. She cupped them in her hands and brushed her fingers over my hardened nipples heading downwards pressing her lips deeply into my skin, I had to maneuver my body on the couch in a complex position to give them both what they wanted. And just like that, without even a moment's notice I could be put on the spot and have to amuse them in any way they wanted. A shameful way to make someone feel like a used toy, I wasn't around for companionship I was there for one thing, I was a compliant piece of eye candy.

Twenty minutes later and Jeffrey had erupted in pleasure. Ghislane sat up, still fully dressed, and wiped the sides of her mouth with her hands, giving a vindictive little chuckle, "That was fun." Jeffrey concurred with a sly grin arching his back for a stretch just looking able to utter the request "Why don't you come up with me upstairs for a steam bath and massage, I need to be loosened up after that?" It was more of a statement than a request, as if I had the choice to say "No thanks, I'm actually tired myself and would love to just relax" instead I would reply with my accustomed trained obedience, "No problem, when your ready lead the way." I had to get dressed again being that we were in Ghislane's downstairs office. Putting my clothes back on, Ghislane thought she had buttered him up just where she wanted him to ask for him to come have a look at her new townhouse renovations when he was finished with his massage. A very strange relationship those two have, there's a definite love flowing between them but not a passionate one, more like a respectful business, he gets what he wants…an uncountable number of girls and she gets what she wants, simple and sweet…an uncountable amount of money. The two things in life that can create such beautiful moments or the most horrendously terrible of them all, is sex and money.

Chapter 15

I joined him for a shower, steam bath and concluded his needs with a massage while listening to classical music. I knew he didn't want anything sexual from me now seeing he got what he already wanted downstairs, no this one was purely therapeutic. My favorite massages to give, making me feel like an actual real therapist. I lathered him in aromatic oils and let my hands discover the ways to unlock the stresses that his body held. After the massage was concluded we were going downstairs to get ready to go see Ghislane's townhouse as he had promised her earlier. He loved taking the hidden staircase while I hated it. I was so creeped out by his choice of décor, the blood red carpets, violent medieval paintings, and sculptures of the pagan god Pan, all of it representing the darker side of hedonism his lifestyle provoked. Spiraling down the hallway along with each step you took came with a pair of eyes that followed your every step. Brown, blue, green, hazel, all of the colors were there, staring at you the entire way down. As each step progressed, so would my anxiety to get out of there.

We found Ghislane where we had left her, in her office. She had just received an order in, a satellite camera with a twelve-inch flat screen. She told us how it was used to pick up any person in any location with the quick insert of an address. Quite a powerful new toy I thought, but it was only a minute display of what the rich could afford, what use they would get out of it was another concern. Soon after she was done figuring out the controls on the camera, we made a rare and first for me pit stop, the security room. What I thought was our way out by the front door was another hidden door. I was in shock as I was led into a room, so discreet that in three years I never even knew it existed. I kept my head down most of the time, knowing how secretive this must be being another door was an entire security base within his mansion. What I could see when I stole a glimpse here and there was an array of tiny screens, twenty odd or something. Small screens showing various rooms of the mansion I had recognized. The images were constantly changing so I found it hard to pinpoint an exact location but from the décor and short glimpses I suddenly knew from then on that my feelings of my every move being watched inside his corridors was now more than a possibility but was actually happening. Jeffrey spoke to an obese Spanish guy at the desk, whose job was to disgustingly overlook all of the video feedback. Kill two birds with one stone Jeffrey thought, free porn to share with all of his pedophile friends and when the occasion called for it, a security system all at one expense. Ever consumed with making money as well as saving it, I was again astonished at Jeffrey's capabilities. I didn't want to even think how deep the video infiltrated, pretending like I never saw anything at all I put the memory to the back of my mind and went on about my day. Stopping at Ghislane's new townhouse, another gift bought and paid

for by Jeffrey, he pointed out needed changes all over the place, driving the builders mad, as always. He wanted the place to scream out "GHISLANE" with a bold statement. Checkered floors and bold colors was the theme, like the queen of hearts from Alice in Wonderland, very well suited I thought.

The dust from the walls being torn down chocked my throat and the elevator was not in use, the stairs were hardly either. The whole house was in bad shape then having to go up three flights of rickety steps was a bit of a risk too but worth it once you made it to her future walk in wardrobe or to us commoners, a closet the size of a small a house. Complete with a dressing room, luxurious bathroom and plenty of storage for her every ensemble. Even without it being finished it was already a work of art, a sanctuary for any woman. She adorned herself in her future home, finally her own, relishing every inch of it, she already put in a work desk and spoke constantly of its ongoing renovations. About an hour later we were off to pick out curtains and look at some paint samples at a couple different boutique looking shops. Easily passing off as an ordinary couple for the day, they walked arm in arm strolling the streets of the Upper East Side. Except to me, still replaying the early afternoon's events, shaking my head over the echoed images in my mind, I followed behind just waiting to be needed again.

Over the course of the next few months was a constant influx of exorbitant excursions at Jeffrey's mansions, mainly to his island, to keep up with his ever-demanding sexual appetite with various young women and teenage girls. I got back on the Xanax, an old habit that I felt at the time would stop my memories from flowing back, rehabilitate my problems and relax me enough to deal with any situation at hand, no matter what the circumstance revealed itself to be. It was a drug that would blind my eyes to everything I should've been running from.

Having Brunel always in the picture these days wasn't helping me at all either. Sending his girls for Jeffrey at all of his places now and at a vigorous flow, they had an abundance of girls at their disposal. If I were to count one girl for everyday of the week, it would be the underestimated statement of the century. So many girls between the two of them, some nights it would be a free for all frenzy for Jeffrey and Brunel, seven or so girls giving them their upmost attention, doting on their every moan and whimper, Jeffrey being the main concern since Brunel worked for him and we were all aware of that too. If there were heaven on earth for men like Jeffrey, than he would be their God. Every one of his inner most desires was fulfilled when his harem of women was around. No wonder he didn't travel much abroad these days, all he ever wanted was right at his doorstep. I couldn't believe that he was still asking me to bring girls to him as well. There was never enough girls to

fill his appetite, so on occasion I would meet a pretty girl around my age and invite her back to his place to make some quick money by offering her a really good contact in the modeling and acting business. Keeping him satisfied and in need of me was a tiring job. With so much competition I had to be on the ball, seeming ambitious to grant him all of his desires. It was a lot of pressure and a spotlight of a role to undertake at such a young age but I told myself this is what my life's training had led me up to be.

My Birthday was around the corner and turning eighteen had lost all of its sparkle and pizzazz. There were no more surprises in store for me, nothing that would bedazzle me I hadn't done already. I spent my birthday on the island, having a quiet dinner and watching "Sex and the City" on the couch with Jeffrey, Ghislane and Emmy. There was no cake or a celebration of any sort but I did get a couple of presents that I opened outside underneath the main cabana. Jeffrey gave me a beautiful pair of sapphire and diamond encrusted earrings and Ghislane bought me another designer makeup case. I thanked the two of them with a tight squeeze and a gratuitous short spiel. As it went quiet, I looked out to the ocean and wondered if across these waters was there ever going to be happier days spent with someone special to me. Would he be kind, compassionate, and always be there when I needed him most? Or would I end up settling for my final bit of training, a marriage to a greedy old scrooge? Either way what I wanted most didn't matter right now, I was still bound by Jeffrey's hold over me and all I had to keep telling myself to get through this epic journey was, this is just the way it was for now.

Around the table for breakfast Jeffrey announced that he was expecting a few guests coming over with Brunel, no one of importance, just his usual entourage of beautiful girls. Russian models this time and Jeffrey was also having a photographer flown in to take modeling photos using the island as the perfect background for a sexy shoot. All of us girls were ushered onto rocks, hammocks, dug into sand and displayed just about anywhere they wanted. We were being photographed in next to nothing, like a netted fabric placed over us if the shot called for it, but the more provocative the more Jeffrey and Brunel loved it.

After the photo shoot we did some outdoor watersports. While us girls raced the jet skis around and jumped on the water trampoline, the men stayed on dry land to watch us from the beach. I was so used to this constant charade of girls and I didn't mind having a bit of fun but this was different, I had to be more than just polite because I already knew it wouldn't be long before we were all intimate with each other as well. Being the only girl that spoke English out of all of them was also a huge blunder. The only way we could communicate was through hand gestures

and body language, a very primitive form of speaking, but what choice did we have?

I did my best to get acquainted and as I had previously assumed after lunch on the beach we were again ushered into another part of the island, Jeffrey's cabana. There was no need for words here, as the girls already knew exactly what to do. Without saying anything they undressed me and began to ravage my body with their hands, tongues, lips and fingers. I was delirious, never having done anything like this before with so many girls. It was sheer chaos; I don't honestly know how men could fantasize over this. Through the glimpses in between bodies crossing over me I could see Jeffrey and Brunel watching us, sitting in a chair with their hands around their penises, stroking themselves together "The best part is they don't even speak English so there's never a need to have to keep them amused" I could hear one of the men divulge and pretty sure it came from Jeffrey laughing out loud to Brunel. I just closed my eyes and went somewhere else in my mind until it was all over. That was that, life went on and we all moved on to eat dinner together.

It couldn't be more awkward as Jeffrey and Brunel were beside themselves with their ego's beaming, and the girls chatted like busy little chipmunks with each other. Ghislane and Emmy on the other end of the table were being amused at the entire racquet around the table and then there was me. Sitting quietly and smiling in people's direction when needed, I was counting down the minutes until I could go lay down in my giant comfortable bed, slipping away to the gentle noises the island created and sink comfortably into a deep sleep with the assistance of my Xanax. Scratching at the plate in front of me with my fork out of boredom, I wasn't even hungry. I had lost my appetite for food. Rather sipping on the champagne I wanted to feel as far away from here as possible. What seemed like hours for everyone to finish their meals we were finally all saying goodnight and goodbye to each other, as Brunel was off early in the morning and taking the eight beauties with him. "Thank God" I told myself, once was more than I could handle of that in one day.

It didn't take me long to get back into my own comfort zone. Heading straight back to my cabana after dessert was served nearly tripping over my own two feet as I tried to scuttle off in a hurry. As soon as I entered my domain, I drew a breath and sighed a deep exhale outwards, finally alone and at peace… for now at least. Although the sun had set hours ago the high temperatures of the Caribbean were still an affliction, plaguing my cabana I was welcomed by a rush of warm air as I opened the door. I hit the switch to the fan and stripped down for a shower. Preparing my towel and toiletries I opened the back door to the outside shower and placed them on the floor. Whether I was cleaning up in the midst of a hot

day or retiring for the evening, an outside shower was always splendid. Under a thick dark cloak of the night sky only the moon and stars to shed enough light for me to see my way around. I could feel the soft breeze lick the droplets falling off of my bodies' curves in the reflection of the moonlight. It only encouraged me to stay longer under the warmth from the spray of rushing water. I let the hot water run out before I was sufficed enough to go back inside. Lounging around the bed in my panties and a tank top I was still sweltering from the heat. Trying to tire myself out, I did some reading and eventually fell asleep. I needed those times to unwind after such an ordeal, letting the Xanax wash away all of the pain I could then forgive the mistakes I had made, blaming myself for staying around for this I had wished I was never born at all. The pills would take all of that away for me. My heart was a tangled weave of deception and pain, only reassured by the lies that were told to me and the lies I would have to convince myself of.

Chapter 16

When we flew back into Palm Beach, Juan drove me back to my apartment. Lonely for some companionship I decided to call an old friend. I was longing to be important to someone and unfortunately with such little time to have a social life of my own I was compelled to call T.J again. His Mom answered the phone and sounded quite surprised to hear my voice on the other end. She was always kind to me, I even used to bring her back "Cola" cans from other countries a bizarre hobby she loved collecting. She just didn't know what I saw in her son, even saying that to his face many times over. Not blind to his ways of cheating and stealing, being a personal victim of it, she made it apparent that she did not approve of T.J's choice in lifestyle. It used to really hurt him how his parents thought so badly of him, so he gave up trying to earn their love a long time ago. As long as he didn't steal from them anymore he was allowed to live there. Instead of that being a lesson to him, he would just try to be more clever in what he would steal, less obvious things. He would steal the toaster and sell it for five dollars if he knew it would help to get him his next high.

Nonetheless and at my expense I had a sweet spot for him. With enough water under the bridge, I was able to forget about the troubles he caused. His Mom told me she'd pass on the message when he got home, but that could be days from now. The last time he had been home was over a couple of weeks now. He only stopped by to get something to eat, have a long sleep and to beg her for a few bucks, supposedly to help him buy food. Then he was off again without a single word said, only leaving

his parents to their own assumptions, which were pretty much correct anyways.

I then called around a couple of mutual friends to see if anyone had heard from him. Everyone I spoke to pointed their fingers in the same direction and the worst place possible, Ritchie's house. One of his best friends told me of how bad he was doing, "He's not the same guy anymore, and all he cares about is the next high he gets. If we don't get anything for him he just loses it and goes off somewhere." It was hard to hear how badly affected my best friend was and a part of me secretly hoped they weren't right. Still defending him, I told everyone I had spoke too while trying to find him that T.J would be fine, he's just probably going through a bad phase, like we all do sometimes and needs people to have his back more than ever now. I was pretty much laughed at on the spot, most people that I considered my friends at the time were only friends by association. As long as we all looked the part, acted the part, and could handle the part, only then did they want to be around us. The last person I called was the last person I had hoped he wasn't with and it turned out that everyone was right.

He was with one of the biggest Coke dealers in our area, Ritchie-Rich, as everyone used to call him. He didn't look like a typical strung out junkie or dealer. Instead he looked like your average preppy college grad with aspiring propositions. He dressed well and acted like a nice guy to imminent clients only to get them hooked on his drugs and then turns them out onto the streets. He was a businessman and his business was thriving. He carried everything from most drugs to guns and knives. Having ears in all places made him a dangerous acquaintance. Using kids off the local Palm Beach streets to run his dirty errands and the errands of the others above him, he made his money by using these teenagers, who as hard as it was to believe was once somebodies sweet child.

I knew T.J didn't have the finances to support himself or his drug habit so the likelihood of him being indebted to Ritchie in other ways was a safe assumption. Obtaining Ritchie's number from one of T.J's friends Marcus he asked me, "What do you want to call Ritchie for? Come over to my place and I can get you whatever you want" Marcus was a sleaze bag who would tirelessly continue to try to appeal to my lesser sense of judgment, never getting the hint or just not caring that I could never and would never be interested in him. "No Thanks Marcus, can I just get the number please, it's very important that I get ahold of T.J, I'm really worried about him." I hated having to call this guy let alone have to ask him for something. "Is this about the Adam bullshit? Cause if it is you can let him know what a fucking bitch he is for not showing up to be there for him, you can tell him from me that it's his fault and it should've been him that's lying in the morgue now, not Adam" I was totally thrown

by his allegations I could only mutter out a whisper "Did you just say that Adam is dead, what happened?" "Oh snaps, I thought you knew, where have you been girl, under a rock or something?" Marcus was less than sensitive about his statements. "He got shot in the head by two black guys who got suspicious when their usual supplier didn't show up, your boy T.J was so fucked up he didn't even remember to turn up at Ritchie's for the delivery, so Ritchie sent Adam alone and now he's dead." Adam was a sweet kid who just happened to be born living on the wrong block. Best friends with T.J since childhood, the two were inseparable until puberty hit and even then they would chase girls together. Adam followed in T.J's every footstep, mimicking his shadow, if T.J jumped off the Eifel Tower then so would Adam so when T.J got hooked on drugs consequently Adam did too, leading ultimately to his death. Wanting to end the conversation with Marcus quickly I scribbled down the phone number on a blank piece of paper in front of me and hung up the phone to call Ritchie's place immediately.

"Yeah?" It was Ritchie whom bluntly answered the phone after the first ring. "Hi –Uh- Rich, It's Jenna, T.J's ex, we met a couple of times at a few parties" I was trying to remind him of who I was knowing how paranoid he was about people having his number. "Oh yeah, I know who you are, what is it you want?" He answered with a dry tone. " I was hoping you could tell me where I could find T.J, I've heard some stuff and am really worried about him, is he alright?" Ritchie snickered at my concerns. "What are you his Mom or something? He's fine, he should be back here around five o'clock, I'll tell him you called." In the middle of me saying "Thanks and good-bye" he hung up the phone, as there is no room for manners in his line of work. I waited until five o'clock watching the minutes on the clock tick past and when five o'clock came and passed by with still no phone call, I couldn't deny to myself that I wasn't stricken with distress. Falling asleep wasn't easy either. I ended up crashing out on my sofa watching T.V, half expecting to hear of another murder on the news and it being T.J.

Forgetting to put on my eye mask before I went to bed, I was woken up the next morning by rays of the sun beaming into my living room. When I sleep I am a creature of darkness, avoiding any window light at all costs. Staggering to the coffee pot not used to getting up this early, my first thought that day was T.J and why he hadn't called. A million thoughts rushed through my head like a steam train…is he ok? Is he not calling because he is still mad from our last breakup? Has he moved on to someone else? Is he in any trouble? Did Ritchie even pass on my message? The thoughts were an endless infliction, consuming my entire day.

Until finally he called my cell phone later in the afternoon, relief swept over me when I heard his voice on the other end. "Thank God you called, I have been so worried about you, are you alright?" I jumped in without letting him get past saying "Hello". "Yeah, I'm fine. Ritchie told me you called his house looking for me yesterday and gave me shit for it saying you were upset or something, what's up?" I knew I would have to be delicate about asking what happened to Adam, thinking he'd be a mess over it. "I heard from Marcus that something happened to Adam and I got worried about you, what is going on?" T.J sounded scared, for what reasons were beyond my knowledge but I was going to find out, he replied " I don't want to talk about it over the phone. Are you in town so we can meet up or something?" It was obvious I wanted him to know that I was more than willing to lend my shoulder for his problems. "I'm home now if you want to come over whenever you feel like it." He didn't hesitate in taking me up on the offer. " But I won't be able to get there until later, I'm downtown at Ritchie's place unless you want to come pick me up."

It was more of a request than a favor to myself which is what he was making it out to sound like, knowing him all to well I didn't make a fuss of his ill-contemplated attributes. I got the address off him and made my way into the ugliness of the not so dazzling parts of the Palm Beaches downtown area. Rolling up my windows and locking the doors to my truck I nervously drove through the rough streets trying to find Ritchie's apartment complex. Knowing all too well the history of the area, it's not a place a lone white girl in a nice truck wants to be seen, many reports of the locals rushing up to a vehicles with a weapon demanding money, cars, or just angry and out to hurt someone. I was speeding through the streets wanting to get out of there as quick as I could. A sad world we live in with so much hurt everywhere you look and nobody wanting to do anything about it, just accepting the hopelessness of never being able to achieve anything more than what our civilization has succumbed to. Being among one of those people, we were similar in so many ways. Only separated by our own personal fears and the different direction they pulled us into.

I drove straight through the open gates at the entrance to the complex and parked on the gutter in front of Ritchie's block of units. A crowd of people stood outside the blocks I was entering. Being hit on and offered drugs simultaneously my cheeks went flush and I put my head down not saying a word. Walking up the corridors of the staircase looked like a scene out of a horror flick. Graffiti covered the peeling of green paint on the walls and the pungent stench of something rotting, only to the worst of my imagination, filled my nostrils. I could hear babies screaming

through the thin walls and trying to find the unit number was difficult from the sporadic flickering of the fluorescent lights above me.

At last I found Ritchie's one, quite astonished with myself that I even made it this far. I had to knock loudly on the door a few times before a young girl answered the door with eyeliner bleeding down from her eyes, her jet black hair was strung out and a mess and she looked off her face on some hard drug. She had only her bra and a short skirt on to cover her private areas and a cigarette hung out of her mouth to complete the full picture of terrible state she was in. She looked me down with contempt and snubbed at me "What do you want?" I maintained my politeness and told her T.J was expecting me. She opened the door and walked away, leaving me by myself to venture through looking for T.J.

Passing through the kitchen it looked like a hospital lab with syringes on the counter tops and medicine containers lying around everywhere. Minding my steps through the dirty house, I walked to the back to the living room and found T.J in a K-Hole strung out on a filthy couch. "Hey…there" he acknowledged me with a giant smile spread across his face. He probably didn't even know who I was from the dreadful state he was in. My first look at him in months and I was in utter shock. My jaw must have dropped to the floor at the very sight of him. Never seeing him so skinny and unhealthy looking I took pity and wanted to help him before things got even worse and he ended up like Adam, dead.

"T.J, hey buddy its Jenna, remember I was coming to pick you up today. You don't look so good, what are you doing so messed up?" I don't think he could even understand what I was even saying because he could only reply by giggling and rolling over, patting the couch as if it were a fluffy animal. I stood over him now and raised my voice so he'd know I was serious and snap out of it a bit. "Get Up T.J, Now!" I ushered at him to get off the couch, repeating myself a few times over and with no response I knew I had to get physical. Rolling him back over to face me again I smacked his face hard and I'm sure it stung but I got the reaction I had wanted. He sat up and looked at me confused.

At least now he was able to focus on my words requesting him to come with me. He was getting up from the couch and stumbling around before falling down to the floor again. Putting his arm around my neck and carrying the majority of his weight, I helped him up many times over and down three flights of stairs into my truck and drove him back to my place. It was a triumph on it's own arriving downstairs in one piece. Being the only person who really cared if T.J lived or died I felt like the responsibility of helping him was my concern alone.

Thankfully Jeffrey was in Palm Beach for the next couple weeks entertaining royalty, which gave me a little time to try and clean T.J up. I called a few of his friends that I knew and asked them not to score any

drugs for him any more, pleading with them and telling all of them he was on the brink of death, reminding them of the friendship between us all that once existed before the drugs corrupted so many of us. Some of them laughed at me telling me I was wasting my time with T.J and others were nice enough to at least lie to my face politely and promise not to help him feed his addiction.

I just wanted to remedy all of his pain and problems but I felt so helpless fighting his battle against the streets. I bought some marijuana for him to smoke hoping to subside the withdrawals he was facing over the next few days but with no avail. The only thing that would help him was my Xanax, a few of those pills and he would go back to sleep, only waking up to get more of them. I would have to force him out of bed to have a shower once a day and make sure he ate something. He was more like a baby right now than he was a boyfriend, too much in need of something I couldn't give.

Chapter 17

When I went to see Jeffrey over the next course of days he picked out the dilemma I wore spread across my face straight away. "Your back with T.J aren't you" It was so funny that he knew me so well. "Yeah, he's in a real bad place in his life right now and needs my help." He looked astonished and replied, "You're a much better friend than I am, I know people like him and trust me they never change, no use in even trying" I believed him too knowing I was stupid for even attempting to change T.J, but my heart felt differently, he was still a human being and a good friend of mine just down at his worst. "That's what good friends are for" I laughed back at his remark, not wanting to take this conversation too much further. " I admire your loyalty at least, but take my word for it, he will hurt you again." His words were chilling but true, I had to find out for myself though.

Almost seeming like an actual friend for a second he ruined his brief momentary image by turning over from the unfinished massage that I was giving to him and acquired his sexual longings from my worn down soul. Not only did he know that I didn't want to endure any more demands tonight, but his energy enhanced from knowing it too. Looking up at him during the foreplay, it was an easy observation from the look in my eyes

that I hated every minute of it, seething through all of my duties until he climaxed.

Most days I could take this kind of treatment, it was only seldom I couldn't hold in the way Jeffrey disregarded my feelings. He had me just where he wanted me, like a pawn piece on a checkers board I was his own personal sex slave. For the remainder of the evening I stayed quiet, not sure of what to say after an episode like that. It was a vigorous display of how calumniating he could really be. He required me to clean up his spilled semen off of his genitals with a wet warm washcloth before he retired to his bedroom for a good night's sleep. Only a monstrous creep could sleep easy at night knowing what pain he caused others.

I went downstairs and asked Juan, who was still in the kitchen to pay me for the evening telling him that Jeffrey had gone to sleep for the night. It wasn't an unusual request. Juan would often have to fix up "the girls" after the sessions and sometimes even drive them home. He went to Jeffrey's desk and underneath was his duffel bag that always held insurmountable bundles of crisp hundred dollar bills. He took out two for me and handed them over. I thanked him and said goodnight, as I was always polite to Juan and his wife, Maria. His eyes were gentle and told me more than what he was allowed to say. I understood well. We all needed to eat and pay bills unfortunately even sometimes at our own moral expense.

Putting the keys into the ignition I started up the engine and reversed out of Jeffrey's driveway with promptness. I didn't want to be there a moment longer than I had to. Not much to look forward too getting back to my apartment either, I needed some time to filter my emotions. Parking my truck in front of a nearby beach I took my shoes off gradually stepping out of the door into the fog. I walked down to the edge of the sand where the water licked at my toes. My life was slipping away from me and I was really beginning to question the difference between living and dying. I was so tired of everything, my whole existence revolved around being everything to everyone, forgetting about being something for myself altogether. Pretending to be someone else became an attribute I was better than good at, probably much of why Jeffrey liked me in the first place. This time I held back my tears back and only let the anger fester into a deep pit in my stomach. My rage was aimed at the very people who abandoned me to fend for myself in the first place and accepted this life as normal for me, my parents.

When I got back to my apartment I was expecting to have to look after T.J, but to my surprise he had come around good that night. He greeted me at the door and asked how my evening was. "It was all fine" I easily lied. I never let anyone inside close enough to see my vulnerabilities. They were mine alone to battle. In my head they were too shameful to

talk about anyways. He wanted to talk about something else anyways. Sitting me down at the dining room table he began his spiel. " I know you don't think much of me anymore, how could you? I'm a junkie who steals and sells drugs for a living, but I promise that's all going to change now. Adam is dead because of me and the only way I can make it up to him is to get away from it all. I promise things are going to get better." It was a convincing talk, but I knew him all too well. His demon inside yearned for him to fail but who was I to second-guess him out loud, I could only try to give him hope. "No one is perfect T.J. At least you're trying now and that's all that matters to me. I am so proud of you." I gave him a sincere hug and kissed him for the first time in a long time. "I love you," he said to me and I returned my love back. We slept in the same bed together that night and were officially back on together.

Two days later I was gone again, beckoned to be in Santa Fe. Ghislane only told me that I was to meet someone there, not sure of whom that was. It wasn't my place to ask questions. As far as I knew it could be anyone and I had no choice but to be compliant to their needs. It was the middle of the day when I arrived at the airport. One of the ranch hands came to pick me up in a big work truck that smelled like dirt and sweat but I didn't mind that's what I loved about the countryside.

When we arrived at the mansion my guest was already there waiting for me. I couldn't wipe the look off my face as he turned around from the bookshelf that he was standing at. "Hello" that same old cheesy grin greeted me once again. It was his highness Prince Andrew, and what a sight. He wrapped his arms around my waist and greeted me like an old friend. I hugged him back rolling my eyes at the same time, already dreading what lay in store over the next couple of days. My job was to entertain him endlessly, whether that meant having to bestow him my body during an erotic massage or simply take him horseback riding. For the next couple of days he was to be my only concern, but he wasn't. I called in checking on T.J a few times a day, not wanting to be a nag but just hoping he hadn't had any thoughts about relapsing. He was doing great, even applying for a couple jobs. Being reassured by him made my time away less complicated and thankfully with the help of my ever-ready Xanax I was able to cope with the ordeal.

The mansion was completely empty save a couple of maids who also cooked our dinners for us, and a couple bodyguards that we hardly even saw at all. The time dragged by slowly for me as I was counting down the hours until I flew away again, anywhere but here I thought. It wasn't easy meeting the sexual desires of these strange men, the Prince being one of them. He loved my feet and even licked in between my toes. Then there was the lack of passion in the intimacy we shared, to him I was just another girl and to me he was just another job. Not the right reasons to be

together but I thought in this world and to these monsters, there didn't need to be a reason. To them it's nothing but a reenactment of their personal fantasies. To me it was a living nightmare.

Thankfully one of Jeffrey's assistants from New York called me on my cell phone early in the morning on the second day to fill me in on my next adventure. I had a flight booked for me to leave that afternoon to arrive at La Guardia airport in the evening. Even though I had to go back to yet another controlling man, I was still relieved. At least I was used to the confinements of Jeffrey's control and in some twisted way he was more comforting than these strangers he sent me to. Overlooking the city of New York as the plane landed felt like I was flying from one cage to another. Entrapped by falling victim to the predators that lured me into their enclosure. I didn't know how I would ever get out again. That deep pit in my stomach began to churn again, a physical reaction to the anxiety I was plagued with. Before getting off the plane I touched up my make-up to hide any signs of the frailty I was feeling.

Jo-Jo met me at the arrival terminal and picked up my luggage for me. He never said much at all, nodding to any reciprocating conversation. I don't think he could really speak that good of English anyways. It was better for me as I preferred the quietness for the moment. He opened the back door for me and we headed off for my next prison cell. When we got to Jeffrey's mansion on 72nd, the place looked empty. I walked up the staircase to Jeffrey's office and he wasn't there. Feeling a bit hungry I walked back down to where the kitchen was. I opened the fridge and found some leftovers that Adam, Jeffrey's chef, had cooked. I loved his cooking, when it wasn't filled with beansprouts and tofu. He used to make me the best pizza upon request, or whenever he was cooking seafood, which he knew I hated. He had an honest appeal about him and never even took notice when on many occasions us girls would be prancing around topless, sometimes even stark naked around the pool or beach. He would have to serve us our meals and would do it with such a casual professionalism, never making anyone uneasy at any occasion.

Half way through my meal the kitchen doors swung open and incoming was Jeffrey and Ghislane. Choking down my bite of food down, I got up from my seat and kissed them both on the cheeks. " Hi guys, how are you?" I greeted them and Ghislane answered for them both "Good, good. Sit down and finish your meal, don't let us interrupt you." I hated eating alone in front of people, chewing food and maintaining a conversation at the same time didn't give off the best look. "I was just finishing anyways, can I get you guys anything, maybe a tea or something?" Always playing my part, another reason to keep me around I guess, I went beyond the call of duty and after the last period with them, I had been reminded of my place. "Yes, I'll take a one" Ghislane stated. "Jeffrey how about you,

anything I can get for you?" I asked again and he answered, "No thanks, we just ate and I'm still full" and they sat down together on the stools at the kitchen bench.

I got out the shiny red kettle from the cupboard, knowing my way all too well around the kitchen and put it over the hot stove plate. Turning around to face them, I thought they were acting peculiar. "So…"Ghislane started the conversation, "How was the ranch with the Prince?" It was a natural reaction for me to blush, knowing exactly what she was referring too. Keeping busy preparing her cup of tea and avoiding eye contact with both of them I started to unpack the counter where I had been eating, "I think he had a really good time, he seemed relaxed during the trip and when we said good-bye to each other he gave me a kiss." I went on to tell them what we did together "I took him horseback riding, nowhere to far just around the property, um… we went swimming in the pool, and of course I gave him plenty of massages. He had a massage at least couple times each day really seeming to enjoy his time there." It's what they wanted to hear, not the truth of how disgusting I had felt over the whole thing but they already knew the truth anyways, it's what they had trained me for in the first place.

Like two proud parents they both looked over me with such content. "Good, you did really well" Jeffrey complimented me. Turning around to the boiling kettle, I finished Ghislane's tea for her and the conversation led on to other subjects. We all ventured up to Jeffrey's office and out came the infamous duffle bag that went wherever he did. I was given close to a thousand dollars for my time in Santa Fe, more than what I thought anybody at my young age could make for a couple days of work. It was fulfilling the obscene vulgar needs of the so-called privileged that earned me so much.

Chapter 18

I spent the next few days in New York, venturing out to do some shopping therapy. I loved the eccentric parts of the city. Every street was different but the same energetic vibe filled all of them, animated with all different walks of life. Hanging out at coffee shops reading the newspaper or a good book was a favorite pastime while in the big apple. Being close enough to get back to Jeffrey for when he needed me but also far enough to get away from all of it. Most of the day slipped by without being missed and I made my way back to Jeffrey's.

Making one last pit stop, I walked into an old bookshop to browse at their assortment of old titles. I wasn't in any hurry so I took my time

reading the backs of interesting looking books. I bumped into a girl looking down the same aisle I was down. "Sorry, I'm so clumsy" she was apologizing for my mistake. "No, no, it was my fault, I wasn't looking at where I was going. I get so wrapped up with my nose in a book and trip over my own two feet if I'm not careful enough." We were both giggling now and I further introduced myself to her. Her name was Valerie or Vickie or something like that, anyways she was a student at a school for hairdressing nearby. Chatting away both young and similar interests in each other's choice of reading we found it easy to speak with one another. She wasn't from around here only being in the city for the last two months, her parents hated her being here, but were also supportive in her big decision to move from the countryside in hopes of her accomplishing her own dreams. Aside from not having her near them, they just wanted her to be happy and supported in her big decision to move to the city, helping her pay some of the way.

She was a pretty girl with cherry red hair and soft white skin. Her long legs were emphasized by the short flowery dress that complimented her hourglass figure. She would definitely fit the pro quo for going down in one of Jeffrey's little black books. Only imagining the look on his face upon meeting her I could already see his sly grin spread from ear to ear. Knowing exactly what he would do with her and the very thought of him tarnishing a sweet country girl such as her just couldn't be done. It was the beginning of a turning point in my life that started with realizing I had a choice at hand and the effect I could have on one person alone. "I must be off, but it was really nice to meet you." Bidding her goodnight and paying for my books I turned around with one last glance over my shoulder and said. "Good luck in the city!" Leaving that bookshop was a small step in a growing abundance of larger strides to come. Turning the corner onto 72nd street I had an undeniable feeling in the pit of my stomach again but this time it wasn't the familiar hurl of anxiety I was used too after I had done something I had wrong that I had regretted, it was a new feeling of pride and inner strength. I quite liked it a lot, I held my head high and smiled on the inside when Jeffrey asked me how my day was and what I got up to, not mentioning I had let one girl slip on bye.

The icy winter winds faded away making way for the approaching sunny days that blossomed the colorful shades of spring. This was my favorite time of the year. Making the most use of his island we spent countless days of the increasingly hot days there. A constant array of visiting guests and plentiful young women to flock around keeping them entertained was the typical lazy afternoon on Little St. Jeff's. We ate, drank, and played under the blue blanket of cloudless skies. To many this lifestyle could seem idyllic, unless you were like me, the one on the other

side of the fence where the grass wasn't so green. Fortunately for me and in some ways not, I was mostly expected to attend to only Jeffrey's insurmountable of sexual desires. Whereas the other girls who came one day and went the next were promised a multitude of open doors just for there meager participation in sexual acts with random men, only to be disappointed when they realized they were nothing more than a single night out for these geriatric senior citizens who most likely due Alzheimer's would sooner forget the entire experience let alone their first name.

Surrounded by those in our world who many looked up too but not seeing them from where I was standing, I didn't have the highest of standards in humanity. Then I met Al Gore and his lovely wife during one of those many weekends away in the Caribbean. I was blown away by the amount of attention Al doted on his wife, it was so sweet to watch. They sat next to each other at the dinner table gazing into one another's eyes having an intimate conversation between them. Among the many guests visiting that night and many of them young beautiful women, not once did Al's eye's stray elsewhere, to them they were the only ones there. He was up for a presidential election that year and he definitely had my vote. Anyone that could show that much devotion and passion towards his loved ones could have the same devotion towards running a country, or at least I thought so. He only left his wife's side to have a walk down to the beach with the host of the weekend, Jeffrey. The weather was still warm in the evening when I decided to break away from the idle chat around the table and take a stroll too.

Not wanting to interrupt the conversation between Jeffrey and Al, I walked in the opposite direction plucking the washed up sea shells imbedded in the sand along the way. I enjoyed the serenity in the solitude of the island. So many nooks and crannies to get lost in, I could imagine that I actually disappeared from the entire world for a moment. By the time I came back to the main house majority of the small crowd had been long gone retired to their cabanas. Even Jeffrey had gone off to bed but trust party animal Ghislane to still be up entertaining the remaining guests left at the table, regaling her wild stories of people and places she has embarked on. Trying not to make eye contact as I walked past them on my way back to my cabana carrying my seashells inside my curled up blouse, I wasn't up for anymore pointless talking tonight. Emptying out my seashells into a plastic bag, I went over my new treasures one by one. I loved collecting odd things, shells being one of my favorites.

Ghislane and I shared that interest together. We would enjoy walk abouts around the island searching for lost pieces of the remnants that pirate's had left behind centuries ago. It was mostly broken plates or smashed glass from bottles of ale, and even occasionally getting lucky

enough to find some old coins here and there. It wasn't easy though, both loving a challenge it was perfect for us. Enduring many scratches from the bushes we would be searching through and then the soar arms from digging all day, but it was worth it in the end. After nearly two years of collecting items and saving them, we made Jeffrey a mosaic table out of the remaining pieces left from the era of the pirate's day. Upon completing it we were both astounded in our creation, it was such an item of rarity and an interesting piece of work. When we presented it to Jeffrey he was even impressed not only in our amazing finds but what we did with them. The table became an important work of art that Jeffrey showed off inside the main house's lounge room, sparking a much intrigue and table conversation by many of the visiting guests to his island.

The next morning was good-bye for most of the visitors, leaving just the usual behind. Soaking in the sun and living it up in the lap of luxury is how the next few weeks were spent before having to get back to the dredge of the city. Sometimes we'd have to go to St. Johns island for Jeffrey to do some work in the office. It was so boring for me to sit in their listening to him on the phone or coming down on some poor employee for something stupid like not answering the phone correctly. If I knew he was going to be awhile I would excuse myself for a bit of shopping. Not that the Caribbean had much to offer in the world of fashion but there was never an amount of bikinis one girl could own and I loved all the little knick knacks one could find there. Flying back on a private jet was the best part because I could transport just about anything I wanted back to my apartment, which was already filled with an assortment from my shopping ventures and collection of seashells from the Caribbean.

The next big dinner party on the island had another significant guest appearance being, the one and only, Bill Clinton. He is the only president in the world to be dismissed from his role as a world leader because he was caught with his trousers around his ankles and had the stain to prove it. Publicly humiliating his wife and himself he retired from his title but not from his lifestyle. This wasn't a big party as such, only a few of us eating at the diner table. There was Jeffrey at the head of it all, as always. On the left side was Emmy, Ghislane and I. Sitting across the table from us was Bill with two lovely girls who were visiting from New York. Bill's wife, Hillary's absence from the night made it easy for his apparent provocative cheeky side to come out. Teasing the girls on either side of him with playful pokes and brassy comments, there was no modesty between any of them. We all finished our meals and scattered in our own different directions.

Jeffrey wanted his evening massage before bed and Ghislane and Emmy went to their office to talk about something, leaving our guest of honor to find company elsewhere. Strolling into the darkness with two beautiful girls around either arm, Bill seemed content to retire for the evening. He wanted to have a hot bath before bed while I began the massage in the tub. Starting with his feet and calves, he wanted to end the night quickly. Never showing any restraint he sat up on the edge of the tub and asked me to preform on him orally. I did my job, but that's all our relationship was these days, a dreadful job. Getting it over and done with as quick as possible was my hope but I couldn't let him pick up on those vibes, to make him enticed I had to act like his little porn star, knowing exactly how he wanted it. Only then would my duties be fulfilled and I would be able to get back the reality of my complicated life. Before I could say goodnight, Jeffrey had one more request. He wanted me to tuck him under the blankets and fluff his pillows for him. Then I had to reach under the covers and massage his feet while watching him fall asleep, he even wanted me to wait like twenty minutes or so after he fell asleep before I could leave. It wasn't unusual for him to ask it but God I hated it, never offering it I would always wait for him to request it. Once he was snoring gently I wiped my hands clean of the lotion and quietly closed the doors to his room. Making my way up the outdoor spiraling staircase, I felt the breeze blow through my hair and looked up to the heavens. The stars shown so bright out here in the middle of nowhere with no big city lights to hinder their effect I could get lost in time staring into them. No matter how far gone I really felt there was always something about a simple caress from the wind or the reflection of the star sweeping sky in the black glossy ocean that would always remind me of my fond love of nature's blessings.

Back in New York, there was nothing left of nature to adorn. It was a dwelling for those who no longer saw the use for trees without cages or blue skies without clouds of man made fumes and gases. Unfortunately if we weren't in the Caribbean, we were there in New York. Hardly going back to Palm Beach, barely even seeing my family, my dog or T.J these days at all. In my parents heads I was all grown up and educated in the world of wealth not needing them any longer they would just wait for my call once in a while to let them know how I was doing and that was the extent to our restricted relationship. The road my life has led down never has kept me close to home anyways so to me it wasn't anything unordinary but still a sad existence to be without a family of my own. It would've been nice to be missed though, rarely letting myself think like that. No room for pity in my heart, if I did, the floodgates could open and I'd have enough grief in one lifetime to go around a few times that they would've never been closed.

Jeffrey's business was running well from the looks of his attentiveness the office he owned in the Upper East Side of Manhattan. Alan Dershowitz, his colleague in finances and personal solicitor, a bird of the same feather, I had seen hanging around the island and Jeffrey's Manhattan mansion, more and more these days. Alan's taste for the young and beautiful was a bias for a blooming business relationship between him and Jeffrey. After an explicit session of Jeffrey's vulgar pilgrimage into my body, we were interrupted by a knock at the door by Jeffrey's good friend, Alan. I wrapped myself up in Jeffrey's pink bed sheets, which is the color preference he chose to sleep in because it reminded him of the same color of his own words "Pussy", and covered my face from the unexpected intrusion. Jeffrey got up and wrapped a towel around his loins and answered the door completely calm. Opening the bedroom door and letting Alan inside they began to converse about business immediately, right in front of me. Jeffrey started to tell Alan what needed to be done while he jostled some notes down quickly. I peeked my head from underneath the covers thinking they were too wrapped up in their work to notice me get up and dressed, and Jeffrey turned back to me and told me to just stay there this would only take a second. Going back to Alan he turned his focus back into work and hustled out a few more orders before letting Alan out of the door and returning his attention to me.

"Sorry about that, work never stops and neither will the money coming in. How else am I going to make a million dollars while I'm sleeping?" Jeffrey chuckled as he sat back down on the bed next to me. I laughed at his humorous and mostly true statement, then a strand of hair fell in front of my face. Before I could get to it he put it back behind my ears and sweetly stroked my face, for a moment we just looked into each other's eyes and he nearly seemed almost human to me. It was bizarre how he could be so kind and gentle one moment and the second beforehand I was being treated like no more than a common plaything left out for display. Nothing more than an ego trip, Jeffrey got off on letting the ones he wanted to know that he could own anything and anyone he wanted in this world. Maybe for a brief minute I believed the sincerity behind his eyes but that vision would quickly fade away and I would be left second-guessing why I even fell for his deceitful tricks for a moment.

Jeffrey got up from the bed and asked me to join him for a shower. In his bedroom, which was the entire top floor, he had a glass shower enclosed underneath a glass skylight right in the middle of the room. It was perfectly accessible feature for a man that loved both being clean and nude, but still an odd feature at that. As I always did whenever I showered with him, I lathered a loofa with soapsuds and would scrub his body, up and down, in between his toes, even behind his ears and of

course his genitals area. The sunlight shown through the glass ceilings into where we were standing, making the moment feel even more surreal on top of the already popped Xanax I had popped before for breakfast earlier that morning. Jeffrey was in such a lighthearted mood that day, making funny cracks at me, and acting like a flirt. When I was finished washing him he actually wanted to wash me too, which was another totally out of his character suggestion.

For the rest of the day, he took me everywhere with him, the office and then to a friends place, even just wanting to hang out with me for a while. I wasn't used to being treated like anything more than a dog on a leash, when he acted like this it just completely spun me around confusing me even more.

We were spending heaps of time together these days, a lot more than usual. At the ranch we would do things together, alone, and not just the usual perverted things I was accustomed to doing with him alone. Horseback riding on his ranch during weekends away by ourselves and movie nights snuggling up over a bucket of popcorn instead of having to massage his feet during the entire film became his way to alter my perception of my original notion that I wasn't just his sex slave, I thought I was finally becoming his friend.

When we went quad biking he no longer wanted me to take my own bike, he preferred me to sit on the back of his, holding onto him tightly and he even tried to teach me how to drive a manual stick shift car. He was definitely trying to show a softer side of himself, different to the stone cold slave driver I had to come to respect out of fear over the many years. Still a hard image to change after all I had been through and seen over the years I had been with him. Nonetheless he was still my "boss" so I humored his attempts and matched his caring demeanor, giving him the impression I was intrigued in our new kind of affair.

Chapter 19

His attentiveness led into the warmer months that commenced the beginning of long summer days that I looked forward too. I couldn't help but enjoy his eagerness to see me more relaxed these days. He wasn't even bothering me to find alternate sources of girls for his twisted satisfaction anymore and although I was still being used for his distorted sexual enjoyments he further seduced me into believing I meant a lot more to him than I ever did.

It all came to a sudden conclusion one sunny afternoon in the Caribbean. Jeffrey pulled himself up to the ladders first step and climbed up the next four steps to the top of the dock. His chest was heaving rapidly as he sat down catching his breath. Ghislane was the next one up and then I followed lastly behind them. To me it was an invigorating snorkel around the shallow reefs within the radius of the dock, but to Jeffrey the half an hour swim in the ocean was enough to overexert his ageing limbs. I took off my snorkel gear and placed it in the storage bench, grabbing us a few towels at the same time. Wrapping a towel around Jeffrey's backside and handing one to Ghislane, I sat down next to them on the dock and we laughed how fatigued Jeffrey was, poking fun that he really is getting older. A very touchy subject for the vain at heart but he didn't seem to mind it, probably knowing we'd never take the joke too far. We sat there in silence for a moment, an odd silence at that. Jeffrey looked at Ghislane and then Ghislane looked at me, placing me once again in the spotlight. They both scooted closer to where I was sitting and I felt something stirring in the air. The biggest turning point of events in all of my time spent with them.

Jeffrey sat next to me and put his hand on my back and looked at me with a certain kind of sincerity I hadn't seen in him before. "I want to first of all tell you that over the last few years you have shown me the kind of devotion and loyalty that I believe is rare to find among people these days, qualities I hold that high in regard." Bewildered by the whole scenario I just nodded every time he paused, trying to grasp what his intentions were getting at. He continued to praise my nature saying " I hope you know my appreciation for your embracing of my lifestyle, you have been achieving a name for yourself among the friends I have introduced you to. Everybody says basically the same thing about you, the same thing I believe. You are a delightfully funny girl who has developed into a mature graceful young woman and I could think of nobody else I'd rather have a child than with than you."

And just like that he created a whole new dilemma for me to face. In utter shock from the completely unexpected proposition and before I could even think of anything to respond with, Ghislane made the finishing touches with the business end of the deal starting with the pros before the cons "You would have around the clock nannies to help you. Jeffrey would pay for a mansion of your choice in either Palm Beach or New York" and as if the drumrolls were beckoning " and… you would have a hefty monthly allowance from Jeffrey's bank account" Astonished at their first offers I nearly took the bait. Then she continued to finish the terms of our pre-agreement with "But you would have to travel with the child where and when Jeffrey wanted you to be, and most importantly you would have to sign a contract stating that Jeffrey and you are not

monogamous and that the child would belong in Jeffrey's custody in the event of a falling out between the two of you." She kind of threw that last one in there quickly, as if she could get away with me not hearing that I would basically have to relinquish the rights to my own flesh in blood and surrender them to a life of servitude and abuse with these people. My maternal alarm bells went off straight away and I already knew my answer. No way I could I do that to any poor baby, God only knew what these monsters had in store for me let alone a baby, but it was an instant reaction that saved me. " I don't know guy's, I mean I'm really young and never really even thought about having kids yet. Wow, I just don't know." I slicked my hand through my hair nervously and took in a silent breath. I had to go beyond what I was truly feeling and give them the feeling that I'd never let them down. Putting an eager smile on my face and sucking up my gut's intuition I told them "You know what, let me get my certificates in massage and have some time to prepare for this and get healthy then next year we'll all think about having a baby together." It was crazy to even hear me say out loud but from the expressions on their faces I had fulfilled their wishes.

Much reason to celebrate that night they were both in a cheery mood around the dinner table. Except for me who had taken double the dosage of Xanax to even cope with the high amounts of anxiety I had been suffering from since we got back from the dock. I wasn't sipping the champagne that night, I was gulping it and when their moods turned from cheery to raunchy later that evening it wasn't hard for me to comply. From the full effects of the state I was in I would've agreed to just about anything, allowing them to treat themselves to ravishing the tender parts of my body.

Over the next few weeks everything went on as it normally would, and not another mention of their proposal. My birthday was only a week away and I was turning nineteen that year. All I wanted was to get my certificates before I got any older and get trapped into this life for good. When my big day rolled around I was in New York with Jeffrey and Ghislane. Sitting on my bed listening to MTV's channel blare in the background of my room I was painting my toenails when I was suddenly buzzed on the intercom. It was Jeffrey calling himself to ask me to meet him in his office in ten minutes. Perfect timing to let my nails dry I thought to myself. Already contemplating his desire to come downstairs I knew it had something to do with my birthday present but I was more expecting the usual shopping money or piece of jewelry, definitely not what he had in store for me.

I knocked on the slightly ajar door to Jeffrey's office and heard him beckon me inside. "Hello, what cha up too?" I asked in a cutesy tone of voice. Walking over to his desk he looked up at me taking his reading

glasses off while granting me a big smile. "Come over here and sit down with me" as he ushered me to come sit on his lap. Pulling me onto him he had a funny look on his face, like he had something really big to tell me and was letting the anticipation build in the thickness of the silence. "What???" I laughed at the way he was looking at me now. "First of all…Happy birthday today." Was only the beginning of his announcement and he proceeded to tell me "I know how much you have wanted this for so long and you are more than deserving of it. You are going away to Thailand to learn authentic Thai Massage and within eight weeks you'll receive a certificate for being a qualified Thai Massage Therapist." Astonished at his attempts to see me get what I wanted, not exactly the type of massage I was interested in but it was a start and a first certificate for me to acquire. My eyes lit up and I threw my arms around his neck, planting a big kiss on his lips, which I rarely ever did.

"Wow, I don't know what to say, this is beyond my wildest dreams…thank you so much!" I did well to let him know I appreciated his grandeur offer. He went on to give me the details of where I'd be staying, the school's schedules, and how much he loved Thai massage, apparently it was the next big thing to hit the shores of America. He had planned out an entire itinerary for me. I was to depart at the end of August and he had already enrolled me in a class at "ITM Massage School". I would only have a few days to settle in before I would be attending classes five days a week over eight hours a day. He even had an assignment for me to do while I was over there. I was to meet up with a girl who was also being put up at the "Princess Hotel" where I was staying. She had an Asian sounding name so I just assumed she was a local girl hoping for an opportunity of a lifetime, if she only knew what she would be getting herself into. If I decided that she met Jeffrey's particular quota of approval then she would be sent over to the U.S to meet with him or one of his esteemed colleagues. Besides the guilt of having to decide a stranger's uncertain fate, everything else sounded more than wonderful. Eight weeks gone from Jeffrey sounded like a lifetime away and I couldn't be more excited at this chance. It was the opportunity of my lifetime and I wasn't going to waste a second of it.

Ghislane came in a few minutes later and the look on her face told me she already knew. I got up from Jeffrey's lap and gave her a big hug and told her, "This is so nice of you guys, Thank you so much!" She didn't share my enthusiasm of excitement. In a dull tone she responded, "I didn't have a thing to do with it, it was all Jeffrey's idea but good-luck anyways." She gave me her best impression of being human for a brief second and hugged me back. It was just her way and I had come to accept it. Depending on the level of slander her insults provoked was just her way of telling you she cares without really ever showing it. Probably

doesn't make sense to most sane people but after all of the time spent with them, I had gotten to understand a few of their quirky ways. Even if I didn't agree with them, they knew I would for their sake of opinion. What did it matter anyways I thought, I had been degraded in every other physical way what's the difference from taking their mental abuse too. Not the exact choice of employers I would've chosen over again if given the opportunity but here I was and doing my very best to excel at their demands.

I was sent home for a little over a week to pack for the long trip and make the rounds visiting my family before I left overseas on my first trip all by myself. It was great to see my family after such a long time away. My older brother and his wife even came down to visit for the well wishing of my departure. Everyone in my family seemed stoked at the prospects my long journey had led me down. Here I was jet setting around the world in my teens and getting paid to study the course of my dreams at a cost that I only knew I would have to pay. It was a wonderful get together with all of them around, a great way to remember them. If I'd only known it would be the last time I would see any of them I would've emphasized to my brothers how much I really loved them both and how much I would miss them in the decade to come! But I didn't know what my future held for me, I had nothing planned out I was just hoping for the right opportunities.

I also had a few good friends to catch up with before I went. Every night was another party and by the end of the week I had drunken enough to drown an Irishman on St. Patty's Day. I was given the lists to all of my friends email address and told to keep in touch. Yeah right I thought, I was going to be too busy having too much fun to be thinking about sitting on a computer emailing people, but I told them I would anyways. Save myself the point of having to explain that in many different ways to a group of already tipsy slurring teenagers. Out of everyone who was really happy for me, T.J wasn't. He hated the idea of me leaving him to have a non-stop party in Thailand without him. He was just starting to seem like he was coming good and I didn't like having to leave him at such a vulnerable state but in my young years I had already realized I needed to do some things for myself and this was one of them. There was still a huge amount of broken trust between us, trust that could probably never be rendered again so I thought I was being decent enough letting him stay at my apartment while I was gone, but he was not to drive my truck, at all. I paid too much money on insurance for that thing and knowing his driving record I didn't want the risk of something happening while I was gone for so long. He didn't agree with me at all, throwing a grown up tantrum all over my apartment. Hitting the walls and doors, shouting the entire complex down, there was nothing I could say or do at this point in

time so I just put my dog on the lead and took her for a walk to calm down the situation and give me some time to be alone. Mary Jane was the only one I hated leaving behind. When we got back from the long walk she barricaded my suitcase while I was packing the horrendous amount of clothing that I always did. I was promising her I wouldn't be long and told her how much I loved her giving her a big hug. I choked back on the tears that were swelling up in my eyes, it was like she already knew the night before I flew out to New York that this would be my final trip.

There was a commercial flight booked for me in the morning and I needed the rest that night to fully recover from my binge of celebration drinking. T.J crept into bed later that night and tried to redeem his behavior with sweet nothings and dry humping my backside. It did nothing for me sexually. I didn't feel like that for him any longer and the sooner he realized that, the better he'd be off. I told him I wasn't up for it and he picked up a pillow and slammed the door behind him. It didn't matter I told myself, the next day I was off and wouldn't have to deal with him or anyone.

T.J caught a cab with me to MIA, the airport in Miami. He walked with me to the furthest point he was allowed to go by the security gates and as we stood in line together it was almost heartbreaking seeing him cry. I told him I'd try to call him everyday, attempting to give him optimistic ways to look at this time away from each other. In the end he had me crying and I had to give into my remaining feelings I had for him. One last kiss under the x-ray bridge and he vanished out of my sight as I furthered down the terminals long hall.

Chapter 20

It was only a short flight to New York and I just couldn't wait until next week when I'd be jetting of to an exotic destination all by my lonesome self. It was all I could think about talk about and dream about, finally my break. Ghislane did what she did best that week and prepped me for everything I could imagine under the sun. Do's and Don'ts, emergency numbers and western union locations were among some things on the list she gave me. Like I said, she showed her caring side in other ways. There was also the name of the girl I was supposed to be meeting, the room she was in and what dates she would be staying there.

When I got out of Ghislane's office I was instructed to meet Jeffrey in his office. She had to stay back for some paper work that she had to catch up on pronto. Making my way up the red and gold trimmed carpeted

staircase I prepared myself for some major sucking up before I left, he would be expecting it for his recent generosity, or so I had thought. Opening those familiar heavy doors the first thing I saw was an unfamiliar face standing over Jeffrey's shoulder.

She was a tall girl with blonde hair twisted up in a professional looking knot. Her big smile was flashing at him with hints of her cheekiness to come and she was dressed to kill with a short tight grey skirt and a matching suit jacket over her white buttoned down blouse, revealing her voluptuous ample cleavage. She looked like the old college professor's wet dream. When she introduced herself to me, a thick Czech accent presented itself. Her name was Nadia Marcinkova and Jeffrey looked just about as smitten as a victim of a love struck arrow from no one but the cupids themselves. Jeffrey further introduced her as his new assistant and masseuse while I would be away, barely taking his eyes off her for one second. It was a bit of a blow to take, being so easily replaced but also a part of me already knew this was expected off someone like him. Good for him I thought to myself, why should I have bitterness over someone I never had intimate feelings for and knew had never really cared for me in the first place. Kissing her on the cheeks and telling her my name, I was doing my best to grin and bear it. We hugged for a brief show of uniformity but it was just that, a show for Jeffrey to see. When he was away for the moment or she wasn't busy hanging off his every word, the way we all started out, she would snub me off to only head off in another direction. A real bitch if anyone was to ask me but no one would anyways it wasn't my job to like her.

Over the next course of days it was my task to show her some of my techniques in massaging Jeffrey and the erotic side of finishing it off. Nadia despised me even more when Jeffrey told her to follow my lead during the massage as she tried to take over and do her own thing a few times. To me it was quite funny her competitive side, I had nothing more to prove so watching her put on an act of seduction and scream out her every body function during a faked orgasm was nothing but entertaining in my eyes. After a few sessions together it was my time to be off on another adventure far, far away from here or from the chains that I wore for way too long. Jeffrey had someone else to fit the chains that kept me so close to him. Even though she wasn't the nicest of girls I still couldn't help but feel sorry for her. No girl should belong to someone out of servitude, but unfortunately it is the way our civilization has been for many centuries before us and I don't see changing any time soon or as long as perverts like Jeffrey are allowed to walk around freely and procure our daughters off the streets all because he's got a lot of money to pay many, many, many people off.

Throw out your confetti because here I come Chang-Mai!! My celebrations started the second I landed, it didn't take me long to make myself aquatinted with a few fellow travelers and find the hot spots of the hustling city. It was like nowhere I had ever been before. The streets were lined with stalls offering an assortment of souvenirs, clothing, and knick-knacks. Everyone lived so freely and was in such great spirits. The parties raged on until the wee hours of the morning and people became best friends over night. From the second I got there I knew Thailand was going to be a lot of fun and I was right! Popping bottles of champagne, dancing all night to the beat of every club's rhythm's along my way and carrying on like it was my birthday…every night was a repetition I could definitely get used too. During the day I was a real good girl, the teachers pet even. Showing the credibility of my experience in massage from over the last few years and already ahead of the class the teacher was using me to help instruct the others with demonstrations. Mostly in a class full of males it wasn't a surprise that I made friends with quite a few of them, some of them with ulterior motives, but for the most part the sleazebags were none of my concern, I had already dealt with a lifetime of them to be able to spot one out and steer clear of his approaches. Out of the entire class I had made friends with only one girl from Wisconsin. She was a plain looking girl with big brown puppy dog eyes and a long drawn out accent. Her first time leaving the States or Wisconsin itself for that matter so it was easy to acknowledge that she was a little taken aback by all of the bustling city life so becoming her friend felt like I was doing a good deed showing her around the hot spots of the Chaing-Mai nightlife. Eventually I even ended up inviting her to stay with me at my hotel. She was running out of money to party every night then pay for school on top of her accommodation, it was all becoming too much out of her small budget. So I thought about it and offered her a bed in my room, I had two of them anyways. Plus she was a really nice girl and if I could help make her first time out of the country an unforgettable experience then I was also gaining something from it as well.

The first month in quickly passed me by. Having such an incredible time on my own and putting my heart into learning Thai Massage it seemed to just fly past. Routinely I had to call in and check in with Jeffrey and Ghislane letting them know my whereabouts and progression in class. Counting down the time left until my course finished Jeffrey was anticipating my departure back to New York. "I can't wait to get my first Thai massage from you. I've got you booked to come straight back to New York for my first one as soon as your course finishes next month." His eagerness put a twisted familiar knot in my stomach. Reminding me of the dream I have to awake from soon and the reality of the certain homecoming I would be arriving to. " It's such a great course, thank you

so much for sending me here to learn this. You are going to love my new area of expertise! I am having such an amazing time over here!!" I had to let him know how much I appreciated what he had done for me and he loved the head swell that it would make him feel as well. Hating the thought of going back to him, I wasn't going to let that put a damper on my spirits while I was still out there. It was my time to party harder than ever before. Every night was a new adventure for me. Chang-Mai was a maze of places to get lost in and the vibrant city was my playground. The way I saw it this was my last chance to get out and break free, letting loose my inner girl it felt so good to take the lead of my own life.

Chapter 21

It was an average evening getting ready in front of the bathroom mirror on just an average Sunday, though unbeknownst to us girls as we sat there chatting away carelessly, this night was already written in the stars for me. It was a very long time ago now when I was still a young child that I sat looking up to those same stars from my bedroom window with my hands pressed tightly together as I cried for God to hear my prayers. All I asked him for was death. My precious life was already such a hopeless battle that I felt too small to fight alone for. Begging him to deliver me from this cruel world I would pray for all of my pain would to away for good. My only clause in my prayers was the possibility that there was somebody in this wide world that I was meant to love, something much bigger than I could have even imagined yet. This invocation of mine was forgotten about long ago now, until tonight.

I wish I had known that night I sat crying beneath the stars that it would all be different one day and that I hadn't sold myself short to the accustomed lifestyle I was brought up to believing was acceptable. It was this night my very soul was about to cosmically collide with the man I was always meant for, the man my heart already belonged to and would know from the instant we met. This night would be the first day to the beginning of my new life to come.

I blushed my cheeks and put on my mascara before me and my girlfriend headed out to hit the town. We were dressed to kill and looking for something to do when we ran into a few of our class mates at one of our favorite drinking spots. They were meeting up for some drinks before a Muay-Thai kickboxing tournament. It sounded like fun when they invited us along to watch it with them. The massive crowd lined the street where the fight was being held and once I got inside the arena it was push

and shove to try to find a spot to watch from. The friends that we were hanging out with were meeting up with another group of guys that were training for the kickboxing tournaments that we were watching.
Then it happened it was the first moment I laid eyes on the man that would love me for the rest of my life. I wasn't expecting the most amazing time of my life to happen right there and then but it did and I would never be the same again. Destiny fell right smack into my lap and there was no stopping it! It wasn't just his smoldering appeal that was obvious at first sight it was the entire package of mannerism and chivalry that made him stand out of the crowd. Stepping right out of the pages of the fairytales I used to read, he was nothing like I had ever come to know before.

Watching him from a close distance he was playfully shadow boxing one of the guys from my massage class and it was at that moment that this handsome stranger first caught me staring at him. From top to toe this athletically built man was intriguing to watch, I couldn't take my eyes off him like I was magnetically drawn to his power of attraction. He further interested me when he wasn't acting like the majority of harping dogs that would jump at the eyes I was giving him now. Instead he coyly played hard to get, making me work for any conversation with him. The fight started and the men were going bezerk, screaming at the fighters in the ring offering either fighter their support or discrimination depending on whom they were batting for. It was like watching a primitive scene out of the days when the cavemen ruled the earth but it was as equally alluring to watch unfold, the sweat, the blood and the absolute brut fascination of it all.

After the fight and all of the men revved up from the fight, I suggested that we all head to the pizza joint in front of the Princess Hotel where I was staying for a late night snack. I made it my goal to make myself known to this appealing stranger. In the tuk-tuk on the way there I made sure I sat next to Robbie. Scooting my knees closer and closer to him on the short ride he continued his chase by moving further away from me, a game of cat and mouse that I loved. When he answered back the array of my questions he had the cutest Aussie accent that drove me absolutely wild.

Gradually we got to know each other better over a pie of peperoni pizza and two can's of coke. Too me he might as well have been the only other person in the restaurant, he knew he had my undivided attention and I think he liked it. There was no one like him that I had ever met before and I knew there was no other who could make me feel the way that I felt at the first sight of him. Being charming and suave was all an accidental front. It was easy to read him. Immediately it wasn't hard to see his sweet side, holding the door and pulling out my chair at the restaurant, I was

already smitten. After pizza he walked me across the street to my hotel where we made plans to meet up again. There was no kiss goodnight or anything like that. No, he was too polite for that, he wanted to prove himself different and different he was. Walking through the hotel's revolving doors I watched as he walked away and when he was finally out of sight, I sung my way up to my room. Floating on cloud nine I was free falling into a deep pit of love.

The next day I attended my class as usual but not able to concentrate like I normally did, too excited about when I'd be seeing Robbie that night again. As I walked out of class that afternoon even the teacher noticed a difference in my performance and asked me if I was feeling well, "On top of the world actually" I smiled back at the old instructor and it wasn't far from the exact truth either. I hadn't ever felt the churning of butterflies in my stomach and the constant thoughts of anyone else like this before. My girlfriend and I got a tuk-tuk back together as we usually did after school and I couldn't shut up about the night before. She was laughing at my girlishness telling me that anyone who just met me would think I had never been let out before, but little did she know that I had more than my fair share in experience with men and never had I ever come across anyone that could make me feel this way, and what spun me out even more was that it was such an instant attraction. Never considering myself a person who believed in the existence of "Love at first sight", but a true romantic deep at heart, I couldn't help but believe in it now. He is my walking proof of it!

Waiting for me in the hotel lobby was the very person I couldn't stop entertaining the thought of all day long, there he was looking ever so fine standing in front of me now. The whole entire world faded away and all that was left for the moment was this complete stranger I had only met last night but somehow captivated the very essence of my very heart. There was no need for me to try and act cool now. He already knew I was snagged hook, line and sinker. Smiling all the way up the many stories in the elevator up to my room he took notice of the posh décor of the hotel. "You should see where I'm staying, this is a royal palace compared to it" His first impression of me he automatically thought I was going to be a spoiled high-maintenance girl that had money coming in from a parents hefty trust fund. Casually he got to find out through many deep and meaningful conversations that my life's grim story wasn't that pretty at all. For some reason beyond my knowledge I had the need to tell this stranger almost everything.

Wanting to be judged and looked down upon for everything about my life that I knew was wrong and being the first time I had spoken about my years with Jeffrey to anyone honestly like that ever before, I had felt like I had deserved punishment. He offered me no judgment, instead only

gave me his warmth and compassion as he wrapped his strong arms around me, making me feel so meager and small but so safe at the same time. Encouraging me to see the worthiness of myself and leave that life behind, he adorned me with a kind love that I wasn't accustomed too.

He took me in and made me feel so at home. It was like I had known him my whole life. I couldn't bear to be without him another second while I was away on this dream holiday. When he wasn't training for Muay-Thai tournaments and I wasn't in school, nobody would ever see us. Too enveloped in each other in my hotel room to care about anything else. Which is why I asked him to come stay at my hotel with me, seeing he was never at his own anyways. My girlfriend was soon departing back to Wisconsin, making my room more than available for him. Enchanted by his words and tender touch, the way he made love to me was again like nothing I had experienced before. Even down to after sex as I had been routinely instructed by Jeffrey to get up for a warm washcloth to clean his genitals afterwards, he refused it, telling me I was no longer a slave and that he didn't want me acting like one. He'd just rather lay down together afterwards and repeat our sweet nothings with many adjoining kisses.

On our third night together with nothing but the bed sheets between us, we had spent all night looking into each other's eyes sharing such an undeniable passion for one another. In the deepest caverns of my heart I knew this man would give me what I had never experienced before...True love. We were still laying in each others arms when the orange and pink sunrise began to rise slowly through the peak's of my rooms windows, enticing me to come feel the freshness of the morning's chill. Only the bed sheets were still wrapped around my body as I went the balcony. It was overlooking the city in a valley surrounded by mountainous tops. My thoughts began to rampage through my head and I knew this could only be a dream for me. It was getting serious now, too serious for the life that I led back home. As if he sensed my anxiety Robbie walked up behind me and wrapped his strong arms around my waistline, gently kissing my neckline and pausing with his ever so thoughtful stares and gave me the exact opening that I needed to expel my thoughts. "Back home, as you already know, I am going back to someone else, it's my job, and as much as I really like you, this guy that I kind of see is going to expect me to be putting him first, I am so sorry to say all of this after such a wonderful few days we have spent together, but you need to know this thing happening between us can't get anymore serious than what we have for now. I am so sorry" I looked down to the floor with nothing else I could say to alter his perception of me now that I had told him the truth and it never dawned on me that thought he wouldn't be out the door before I could even finish my sentence but he

continued to surprise me with his efforts to make me believe we were more than just friends with a summer crush. " You see… your problem is that you don't see what I am looking at right here in front of me, a beautiful girl who is completely lost in a game that she has no control over. Get out of it now, take my hand and follow me back to my home in Australia." I heard what he had said but I found it hard to comprehend what he was actually talking about. "What?" I asked him with a look of confusion on my face. "Your nobody's property, you can do this. Marry me." His statements got more and more profound as he went on. Repeating the question he got on one knee and proposed again " Jenna, I am in love with you and want to spend the rest of my life making you happy. Please don't go back to him. I know that I am the only one for you and I will always treat you right. He paused for another second and repeated his question "Jenna, will you please marry me?" My hands fell into my face after that and without even letting myself think through the answer, I let my heart do all of the talking. Looking back up at him I said "Yes!" I almost shouted the answer at him, as if saying it louder would give the word more meaning. Wanting to believe him and everything that he was saying felt like a vacation from all of the suffering and loneliness that I had endured over a lifetime of abuse and degradation but knowing what you want and getting it are two different things that rarely went hand in hand…or so I thought. All I knew from the brief period I had known this stranger was that he was offering me a life and love down an unfamiliar path and it was a gamble to believe a complete stranger but somehow I knew he was right. My heart was beating so loud I thought it was going to jump right out of my chest. With the earnestly in my reply he picked me up in his strong arms and took me back to the bed and reiterated his words in a more physical sense this time. Never had I felt loved like this before, so swept off my feet and unable to even think, eat, or do anything for that matter which would involve leaving the hotel room without him.

Everyday after school would be my Robbie waiting to take me back to the hotel room for another night's passionate rendezvous, but a few nights after his proposal, he had another surprise in store. He didn't just want to get married someday. He wanted to get married now, this week even. I walked into the fabric store and was attended too by several seamstresses who were already be expecting my arrival. I was there to design and have fun designing my own dream wedding dress. While I was busy picking out fabrics and having measurements taken I would look away for a moment only to catch his tender eyes staring in my direction. Such adoration behind his looks…could it be real? I would often ponder it to myself just hoping for the gamble I was taking to work

out. I still had to believe in something better than what I was accustomed too and here he was right smack dab in front of me.

Giggling at all of the lace and frills they were trying to dress me up in, looking more like an antique porcelain doll than anything else I closed my eyes and pictured the day that I thought would never come, starting to imagine the kind of dress I would like to wear I envisioned a simple sleekness, a complimentary figure hugging gown with a small train but long enough to distinct it as an actual wedding dress. After we settled on what we were going to wear for the big day, we would next have to decide where we would hold the ceremony. Not before celebrating the entire week beforehand though. We started our honeymoon early celebrating every night spending our time between my hotel room and sending our heads spinning on the dance floor at many different clubs. Only with each other in sight, the dance floor was ours, we were out to give each other something to remember each night by. I whispered all of the things I couldn't wait to do him once we got back to the hotel room and watching him heat up on the dance floor I was never able to get enough of him driving me crazy. Like a thirst I was unable to quench, his lips were like a fountain of deep springs that I could never reach the bottom of.

Seven days, exactly a week after his proposal I sat on my bed in distress, contemplating what I would say to the man who I was about to call. There was no nice way to go about it. I couldn't last forever with him and this was my one chance to get out of it for good. I was leaving him, never to return to him ever again. I just had to go ahead and do it. Part of me was hoping he'd be at least a little happy for me and the sudden change in my life's direction but the other part of me knew I was already asking too much of him.

Calling his office in New York I was transferred to Jeffrey's personal office. He picked up the phone on the third ring, pausing before I could get any of the words to come out of my mouth but I mustered up my courage eventually and gave him my prepared spiel. Beginning with how much I had appreciated everything he has done for me up until this point. I hoped he would be understanding but he just wanted me to hurry up and get to the point. Trying to contagiously pass on my excitement through the phone lines, I finally screamed out "I'm getting married! Can you believe it?" No reply was given only a silence on the other end. Trying to make some conversation ridding the uncomfortable silence, I went on to tell him about Robbie and how I had fallen madly in love with him over the last amazing few days we'd spent together. The absence of sound made my thoughts begin to run wild and to get some response I had to ask him what he thought about everything I was telling him. Finally a few seconds later his reaction to the news sunk in and his only and final reply

until many years to come was " Have a good life!" With that statement he slammed down phone receiver. Leaving only an echo of the dial tone to answer back too. I was to paralyzed from the shocking response. "What have I just done?" was the first thing that entered my thoughts. Overwhelmed with guilt I felt like I was falling down a deep and dark hole and then the tears began to flood in. Here I was standing at the dawn of a new happy life for myself and I couldn't see past how bad I had let Jeffrey down not yet seeing the hold he had on me.

Like my knight on a white horse, in came my hero to soothe my somberness. He rushed over to the bed where I was beating myself up mentally and wiped the falling tears from my cheeks. "I take it that it didn't go so well…huh?" Sniffling through my sobs I managed to tell him that "It doesn't matter anymore all I care about is you and leaving all of that life behind me!" I wrapped my arms around him and he asked me in a half joking voice "Then why are you crying?" He got me almost laughing now too "I guess it's just so scary taking such a huge plunge away from what I'm used too and taking such a big move to another country. It's just all so different and I'm just trying to comprehend everything that is happening in such a short time." Always out to lift my spirits his next comments made me gush in laughter "You think that was a hard phone call wait until I call my Sicilian mother! Watch this, I know exactly what she'll say. First it'll be a saga about how I'm killing her with my selfish actions then it'll be about how she's going to kill herself for doing such a terrible job raising normal children. Don't worry though, she'll love every second of it. Wogs thrive off of the drama in their lives and off everybody else's for that matter!!" He was pretty much on the dot when he told me how she'd react to the news. In the end after relentlessly trying to change his mind, she sighed, "If it was going to be anybody to do something as crazy as this, Robbie, it would be you!" It wasn't a blessing as such but at least she wasn't threatening suicide any longer.

Calling the closest of our families the night before our wedding to share with them our announcement wasn't celebrated by any members of either sides but that didn't discern us one bit. My parents took it well, considering their only daughter was marrying a foreign man that they didn't know from the next guy on the street and too top it off I was moving to Australia, permanently. When I asked my Dad many years later why they hadn't put up a fight, he just simply replied that nobody expected it too last very long. Fair enough, I thought. I don't think anyone did at first…even us at our toughest times. We were a rare attribute these days in the numb era we have all been accustomed to living in, turning nothing into something, which I had also come to realize, was the most precious gift in life…Love.

Falling asleep was easy to do in his arms that night. I laid my head on top of his chest listening to the drum of his beating heart. I had never felt like I was more at home than ever before in my life. He pulled me gently in closer to him, letting me know that he was there for me even when the lights went out and the thoughts would usually creep in. Amazing how he knew what I needed without even asking for it. Wishing for something like this my whole life I thought I was being such a fool in so many ways, but I was so wrong. The way his pretty eyes looked at me with such an understanding and compassionate sincerity made me want to trust his words and believe the love that he was offering me was indeed real.

The next morning, Robbie was up and out of bed early to pick up our tailored wedding suits and dresses for our big day at Doi Cept Temple. His best friend from high school days that was travelling with him from Australia met him in the hotel lobby at seven o'clock. He was going to be joining us for the wedding as Robbie's best man. He still hadn't been able to find black shoes to go with the suit, so after he dropped off my dress back to me he was off again to try and find himself a pair of decent looking ones. Overjoyed with excitement I was thrilled from the second I kissed Robbie good-bye for the last time before we were officially married. Looking in the same mirror only a week ago I was now a different person, I felt like I was plunging into a bottomless abyss. Here I go, I thought to myself as I plunged out the door letting the butterflies in my stomach carry me all the way to my nearly husband.

I had to go to the beauticians that morning for my pre- wedding makeup and dressing. The ladies who were doing my hair and face at the salon did a great job making me feel so beautiful for my special occasion that every girl dreams about their whole entire life. Requesting simplicity at best, not wanting to go overboard with all of the wedding apparel they tied my long hair up into a knot wrapping around it a veil of flowers made up of baby's breath and small yellow and purple budding flowers. I couldn't have dreamt it up better myself and when I met my husband to be at the bottom of the mountain he stood before me speechless "You look so… beautiful!" were his first words that his mouth formed almost whispering them. He took my hand and we walked into the sky lift together. Behind us followed an interpreter that Robbie hired to translate the Buddhist Monks ceremony speech for us English only speakers and then his best friend, who only moments before gave him the best mans speech about being the last chance to walk away from this and not get married to a girl he hardly knew, but my Robbie wouldn't hear a word of it. He already made up his mind the instant he proposed and I said yes, "I was born to be with this girl," he told his best mate. "Alright then lets go do this then!" Once he knew Robbie was sure in his decision he was more than ecstatic for him. We were slowly lifted up the tremendous mountainside,

surrounded by the floral green carpet of mossy grass that covered the earthly skyscraper and falling fog, it was like being carried to heaven or the closest thing to it! Taking my eyes off the scenery and catching him adoringly staring at me again, I welled up with unstoppable tears. "I am so lucky, is this really happening?" He squeezed my hands and replied back "You're the only one for me…I love you!" relieving the anxiety written all over my tear stained face.

Chapter 22

Getting out of the carriage we were greeted by good fortune from the Gods above. A sun shower cascaded over us at we advanced into the ancient holy temple. My tears of joy dried and my happiness was glowing for all to see. The many visitors to the temple stopped and took photos of the passing bride and groom, no other foreigners had ever been married there and certainly anyone wearing traditional western wedding attire, such a sight had never been seen behind these religious walls, we became a permanent icon at the temple. The ceremony was done in the Buddhist customs according to their ancestral accordance, and translated for us in our own language. Both Robbie and I were anointed with a blessing from the monk with a splash of water and seven sacramental bracelets, each one representing another meaning to the longevity of our union together. We signed our names in the Buddhist wedding registry of Doi Cept Temple and officially became Mr. & Mrs. Roberts at least officially in our hearts knowing the laws of Australia only recognize certified weddings, meaning when we got back to his homeland we'd have to make a run for the courthouse. This was our real wedding though, perfect down to every detail. Walking up to the highest point of the temple to the balcony hanging over the edge of a cliff side over looking the city of Chang-Mai, we knew we had found the perfect spot to recite our vows of love to each other. Providing everything for me and more than I could ever ask for, his vows were to love me unconditionally until death do we part, shelter me from all the cruelty in the world that I was so accustomed too and to be like the bear, because the bear never forgets. Tears once again streamed down from my eyes as he made this moment unforgettable. Wiping the mascara fading underneath my eyelids whilst giggling at my embarrassment I took his hands back into mine again and gave him the vows that were the sacred prepared words from my heart. My ears were thundering the sound of a million horses hoofs descending downhill and my heart was beating so fast my words barely trembled out of my mouth when I began to tell him how much he had changed my

whole life around and how I would dedicate my entire being to loving him and only him until I blew my final breath.

I meant every word that I said to him, this was it for me, wanting nothing more out of life than to be with someone like him to raise a few kids together and grow old on the front porch letting the days fade us by. I know it probably sounds boring to most and it would've to me as well many years ago but after the life I had led, I had enough experience in the real world for my liking and now all I want to do is to enjoy the remaining days of my life for what it is…a simple and satisfying existence. Our day was so special but not only to us, even too the Monk that married us. Upon our descent down the lifts he asked if he could take a photo with the bride and groom in front of their symbolic liberty bell signifying the union between east and west. It represented a lot for us too, it was the commencement of a new life together and just the beginning of battling each other's past demons together.

Kissing the bridal party goodbye, who were just the local girls I had met on some of our many nights out of having fun. I threw my arranged bouquet of Thailand's white wedding floras mixed with colorful orchids to the screaming Thai women behind me and we were given one last tradition to take with us, the release of caged doves. It was such an incredible gesture, especially for me. Symbolizing their freedom as well as mine I opened the cage's door to let them free to decide our own fates. As the wings on the birds began to spread open and they took their final decent into the blue skies granting themselves freedom I knew mine had finally come too. The relevance of watching them fly away and how I had perceived my own day of marriage related to the identical feeling of fleeing an entrapment of my own kind. I was liberated from the bounds of slavery I had come to know over the many years I had spent with my fair share of greedy perverted old men only to have serendipity mend my scars with the powerful healing of what true love has to endeavor on.

As customary in the romance novels I had read as a young girl he picked me up in the hallway before our hotel suite and carried me over the threshold, poufy dress and all. My arms were tightly squeezed around his neck never once taking my eyes off of him until he revealed yet another sweet surprise. Besides the cleaners tiding up my room while we were gone they were also given instructions by none other than the groom himself to pick the petals off the stems of red roses to place on our bed in the shape of a giant heart. The rose petals led the way to where we consummated our love physically and it was undeniably the first time in my life I had really ever been made love too. Hours had passed by before we thought about anything else besides one another's words of arousal, tantalizing touches, and lingering kisses. We ate a quiet dinner at a local restaurant and went straight back to the arms of each other again, so

profoundly in love with one another it was the ideal display of what the "honeymoon period" should have to show for. It was crazy, young and energetic, just what it should be between two blossoming lovers.

The following morning we left the Princess Hotel, no longer under any of Jeffrey's financial privileges or control so to speak, continuing our love spree in another dwelling of our own accord. Three days later when we finally showed our face for the first time since checking in downstairs in the new hotel lobby, besides to request fresh sheets and towels, the entire staff of the hotel had a good laugh at our expenditure, from their reaction it must've been nice to see a couple so affectionately fond of each other.

Now we wanted to have another type of fun, Robbie had visited a tourist agent by himself before we got hitched to book a honeymoon itinerary for us to explore Thailand and beyond together, another surprise he had in store for me. We left early in the morning and joined the crowded bus for our journey beyond the border of Thailand to a village in the war torn nation of Laos. When we got through the extremely armored visa office eight hours off the beaten path, we then had to cross a flooding river from a recent heavy downpour of rain in a slim banana boat that looked like it could barely handle our weight let alone the excess of my luggage that Robbie was so kind to trek around the world for me.

Unbelievably we did make it to the other side only to find that my honeymoon in the tropics wasn't exactly how it had been explained to me. Naked children ran through the dirty streets, with one boy that decided to release his bladder on the pathway where we were walking as we passed by him on the way to our hotel. My doubts of his choice in destinations became apparent after that sight. Robbie was getting hungry after we hadn't eaten the entire duration of the trip and being such a rugged man he could digest just about anything. Deciding to stop on the side of the road he ordered some kind of seafood dish…daring I thought, settling for some toast and jam, something safer I thought. Then I saw the lady behind the counter dip some plates in a dirty bucket full of dirty water and then rinse in another bucket of water that didn't look as bad as the previous mud drenched one and then further proceeded to put my toast and his food on top of them serving it to us all in a clear view. I just couldn't bring myself to even fathom it "I can't eat that!" I mouthed in a hushed voice trying to quietly make my point clear but was made public with his loud mouth outburst of "Why not? Looks fine to me. You have to try and eat something, you haven't eaten all day!" I know it was just his caring side that was trying to force me and to top it off he is Sicilian and they're all about eating so it was our first debate and now we were officially married with many more marital conflicts to subsequently follow. Two head strong and stubborn people both with the right

intentions but still recovering from old wounds. It was only natural and important that we fought just as much as we made passionate love together. Countlessly proving to one another the true intentions of each other loves but sometimes in not so seemingly actions.

Finally arriving at the hotel it was like a scene out of a horror flick. We were showed up to the room that looked like someone had been brutally killed in. The bed sheets were torn apart and the bed was stained with blood from some poor helpless victim. Nearly vomiting at the pure sight of the room and the stench that accompanied it, I was now tearing at the thought of even staying here for a single moment longer. "No way!" I told my new husband and from the tone in my voice he knew I was serious. Not that I was not denying the fact I have never been an outback type of girl. I was fine with that impression, I am no snob but give me the simple luxuries of a clean bed and a shower then I'll make myself at home, but this was just the epitome of filth and even possibly an act of a horrendous event but who knows, the lady who showed us to the room seemed fine with it passing it off as a hooker on her period. In some ways that was even worse…"Yuk…Okay Robbie it's time to go…now!" we were heading back down hill back to the passport center declaring our passage back into Thailand. Considering us a risk due to the short time we spent crossing the border and back, the officials held us at gunpoint while others rummaged through our luggage for drugs or whatnot. Finding nothing of course they released us and stamped our passports, making us good for another three months if we wanted. We were thankful for escaping with our lives alone, although we had nothing to hide but still an endearing experience nonetheless in the first days of our honeymoon of all days.

Chapter 23

Arriving in Koh Samui for finally a bit of relaxation in the tropics, it was my idea of how a holiday should be, sunny warm, and clean… well, clean enough. We lived it up like kings for the next six weeks. Making it an ideal way for two strangers to properly get acquainted. Dancing into the wee hours of the night and making love in the blistering heat of the sunny days we discovered everything on that island… mostly being each other. We made friends of all sorts, mostly travelers, but everyone the same in being taken aback by our fairytale romance. With our captivated eyes never straying too far from one another anyone could easily see the strong chemistry between us.

Trying to find the woman in me wasn't difficult, as I took to the bounds of marriage with such ease, no longer a girl I loved the idea of being a

wife and belonging to a husband like Robbie. Marriage was bliss for the duration of our honeymoon until we had to ride coach on our way to Bangkok Airport to fly out to Australia. Chatting away with always so much to say to each other we watched a movie and finally got comfortable leaning up against each other as pillows. We both fell asleep on the long ride and when we woke up to the sound of the buses brakes coming to a halt we initially realized my purse and Robbie's wallet with all of our money and cards in it was missing. Stranded in the city of Bangkok was frightening enough as it was but too make matters worse a lady looking in her mid-seventies, scrawny and hunched over from an obvious lack of nutrition lifted up her skirt to a passer-byer with a she-male hanging off his arm and began smacking her vagina blaring out "Look! No cock…Pussy, pussy! Only five baht" repeating herself many times over the man just walked on past as she sat back down on the curb waiting for the next alluring customer. Robbie and I shook our heads in disgust and disbelief, things could really be that bad for someone, I would know best as it wasn't far off the life Jeffrey had been training me up for.

Completely broke at two o'clock in the morning and with no one to call for help, I panicked right away. Robbie rubbed my back and his tired eyes trying to make the situation better. Luckily we had made friends with some really nice people from the resort on the island who gave us about two thousand baht when they saw how devastated Robbie and I were. With just enough money to rent a really cheap room for the night at a backpackers hostel and pay for a taxi to the airport the following day, we were saved.

Early the next morning we were off in separate planes, since Robbie's ticket was pre-booked and no available seats left for me to join him meant we would be landing in Australia separately. Fortunately we had found a corresponding flight that arrived within the same hour of each other but I would have to make a stop over to the Philippines. The lengthy hours of the duration on the flight seemed to stretch on with only the thoughts of the journey ahead of me I couldn't wait to get back to my husbands loving arms. The trip was going well, sleeping the majority of the flight until I had to change planes in the Philippines.

After the plane landed and before any passenger was allowed to get off we were handed a declaration statement that informed us that if we were carrying any drugs or weaponry, we would be arrested and face charges with death as the ultimate penalty. Not that I had anything to worry about, but what a thought to willingly sign over your life. I got the chills handing over my signed declaration and traveling documents to the customs officer. Obtaining my passport he additionally asked to see my departing ticket. No problem I thought, just I had done many of times, and I handed over the requested information. The officer looked me over

and got on the phone immediately which sounded like a phone call to his superiors but I couldn't tell since it was in another language. A brief conversation but long enough to get me thinking, he then called over two guards who took me by the arms and brought me into an empty room but for a desk and three chairs to be interrogated. No one would tell me what was going on they all just scattered around in frenzy, ignoring all of my hysterical inquisitions. Leaving me by myself and alone with my thoughts I couldn't help but panic even worse now.

This was a total bombshell of confusion on my part, what had I done wrong? Minute's later a large-framed women in a green uniform entered the room with the guards from before and sat down across from me with a stern look in her eyes. She placed my documents on the desk in between us. Not saying a word to me she was waiting for me to give her an explanation for something. "Can you please tell me what this is about, have I done something wrong?" I asked her politely, trying to restraint any animosity towards her. Her reply sounded as grim as she looked. "You have been in Thailand for three months and now you have only a one way ticket booked to Australia with no visa. What exactly are your plans once you get there, Ms. Roberts?" To myself I wondered what business it was to her, don't people travel with one-way tickets all the time? Knowing I was in no position to be able to say anything like that or even at all I just gave in nicely and told her my intentions to travel over there. Crying through my entire explanation I wasn't sure if I was going to even make my flight now. She had to think about everything I had told her for a moment, deciding whether or not she would grant me permission to meet my husband in Australia or send me back alone to Bangkok. With only time on my side she had to make a hasty verdict now. One more question had to be answered before I was let go, she wanted some proof. " If you have just got married can you show me your marriage certificate then?" This didn't help my stories credibility at all seeing that we were married in a Buddhist temple and given woven bracelets instead of certificates. Explaining to her that I didn't have one to show her yet but was already aware that I would have to obtain a legal marriage certificate through a courthouse upon my arrival in Australia to stay there legally, it was only because of my husbands beliefs we wanted to get married in a Buddhist ceremony. She must have shared a common interest in religion or something like that as she finally cracked a smile upon the photos of the wedding day that I showed her and carrying in my purse since getting them developed, if she wanted proof, well this is all I really had.

Handing me back my documents and ticket I was now free to leave but she wasn't leaving me much time to run through the airports terminal to get to my departing plane. Expeditiously bolting through the busy airport

my adrenaline was still pumping from the previous encounter with the officials of the Philippines who had enough power to condemn me if they had felt like it. I caught my plane in the knick of time and once I was settled in my seat my thoughts went back to my dear Robbie and how much I was missing him. I was just relieved that I was on my way to be back with him again soon.

Looking out the window I could see the red earth beneath me. As I landed for the last time I took notice of the first steps I walked off the plane and onto a new soil for the first time. I had so much to be looking forward too in my new homeland. In my heart I knew this was all I ever wanted, this was going to be my haven. There was another surprise in store for me when two elder strangers walked up to me and asked my name. "Are you Jenna?" Nodding at their question they gave me their first names and wrapped their arms around my neck. My new mother-in law then said, " We are Robbie's parents. We wanted to be the first ones who welcomed you to Australia and into our family" It was my in-laws meeting me for the first time. Handing me some balloons and flowers they even had gifts for their new daughter-in law. While waiting for Robbie's plane to arrive we all chatted about many things like the flight over from Thailand and the scare at the previous airport in the Philippines. I asked them how they knew whom to look for? My father in law laughed, saying recognizing me was easy from Robbie's detailed description. He told them to look out for a petite, young blonde carrying an abundance of luggage. Laughing together over a few more brief conversations of getting to know each other better they seemed relieved to finally meet me compared how stressed she sounded in the conversations I overheard Robbie having with her while in Thailand.

Watching the arrivals board I knew Robbie's plane had landed ages ago but was just waiting for him to get out of customs. It didn't bother me anyhow, I was enjoying get accompanied with his parents for the first time. Eventually I saw my husband walking down the runway behind the gates, I just couldn't wait a second longer. I ducked underneath the gates and ran all the way up the runway to jump excitedly into his arms. I wrapped my arms and legs around him holding onto him for dear life. I just missed him so much I knew I would never let him go, theoretically speaking that is, and I never have nearly a decade later.

Chapter 24

Over the near decade we spent together, Robbie and I have shared the common highs and lows that every determined marriage endures. It has

taken a lot of hard work and doesn't come without its flaws but no matter what it is just perfect for the two of us. He helped me how to remember to smile again and life has slowly began to sort itself out. They say that time heals all wounds but what I had experienced in my young years wasn't nearly long enough to let all of the hurt go. Seeking help through many counselors and psychiatrists I was doing everything I could do to deal with the scars and all of the pain left behind. Completely off of any pharmaceuticals, since the last day of our honeymoon, and healing my heart with love instead of hate our marriage is my foundation and Robbie is my solid rock. We have to be for one another, putting the bonds of our union through the wringers and back, as neither of us expected my past life eventually to come back and haunt me after so long.

Our blissful life came to a sudden halt one day when we were out visiting my in-laws at their nearby house on just another plain afternoon. There was a knock on the front door and my father in law got up from watching TV on the couch to answer it. He rushed back quickly coming into the dining room, where I was feeding my nineteen months and five month old boys at the table, and he blurted out, "Jenna there are three police officer's at the door asking for you by the name of Virginia Roberts!" I asked my mother in law to stay with the babies to find out what this was all about. I didn't even think it had anything to do with Jeffrey at first and wasn't even worried when I opened the door to offer them to come inside to talk.

They weren't actually police officers and two federal agents of Australia with one F.B.I agent from America. The American agent asked if I wouldn't mind actually coming outside so that I may speak with them in private. "Okay" I said, as well as mentally preparing myself for something big from the look of it, it's not over a parking ticket or anything small that you get three federal agents knocking at your in-laws front door asking to speak in private. "Can we first ask you if you are in fact Ms. Virginia Roberts and originally from Palm Beach County in the United States?" I confirmed my name and previous state of residence then they even asked, "May we see some identification please?" A different agent asked the question this time and I told him "I will have to go and grab it, my purse is inside. I'll just be one second."

Robbie was standing on the other side of the door trying to figure out what they were doing here talking to me and when I rushed through it to grab my purse and saw him standing there looking puzzled, I told him I had no idea what this was about yet, but not too worry everything was going too be just fine. Taking a deep breath and slowly exhaling outwards, I opened the door to find out exactly what the agents wanted to talk about.

Pulling out my Australian drivers license from my wallet, I was going to hand it over to them but they were sufficed at a quick glance. There was no meet and greet, they went straight to the point. One agent picked up a briefcase off the porch floor and opened it up taking out a stapled stack of paper. Then that same agent asked me if I had ever known an affiliate by the name of Mr. Jeffrey Epstein. All of the sudden my stomach tangled in a familiar knot that I hadn't felt in many years from a past life that I was trying to forget about. I nodded in affirmation of their question and said "It was a long time ago and he's no longer an affiliate of mine, but yes, I did know him once." It was shameful enough to think about let alone talk about with them for the first time since I had started my entire life over. His next response left me nothing short of speechless. The United States Attorney's Office for the district of Florida was giving me a notification of being an identified victim. Jeffrey was finally caught for his atrocious acts of perversion on girls who were barely old enough to even comprehend "the birds and the bees" so to speak.

On June 30th 2008, Jeffrey Epstein pleaded guilty for procurement of minors to engage in and solicitation of prostitution. More than a dozen girls had been named as victims of Jeffrey's federal offense's and without ever stepping a day in court he was granted a plea bargain consenting to charges that named him a registered pedophile for only two of the minor girls. Getting away with even serving only twelve of the sentenced eighteen months behind bars be that in the evening alone and in the morning he was released during the day. Restricted to the confinement of his lavish mansion in Palm Beach only to be with his original sex slaves from over ten years ago, Nadia Marcinkova and Sarah Kellen, and knowing Jeffrey all too well, they wouldn't be the only ones there while he was pulling his laughing stint of retribution. Even at nighttime the girls were still allowed to visit him, accounting to nearly seventy times while serving his time in incarceration.

No justice had been served for any of us victims. Denied the very constitutional rights allegedly there to protect and serve us. We weren't allowed to have a voice in front of a jury and judge or even informed for that matter. Instead we were handed this notification of being a victim but told we were all too late to do anything about. To make matters worse part of that plea bargain was that we had the option to sue him with the lawyers he provided for us, and conveniently enough I found out later they were also his lawyer's old friends from the college days.

I felt my knees go weak and the anxiety churning in my stomach was now making me feel sick. Taking the bundle of paperwork from the agent who was now handing it to over me, I had to excuse myself before my legs actually buckled. Closing the door behind me I couldn't even find the words to tell my husband what was going on. I rushed to the back of

the house and went out to the back yard where I wanted a minute to compose myself and process the information I had just been told. Robbie followed behind me but the stillness in my eyes convinced him to give me that moment to compile my emotions.

A few moments later and I was ready to talk. Collapsing into his arms with such anguish, he just held me until my sobs subsided and I was able to tell him what actually happened. Starting with an apology, I began to tell him how I was so sorry but my troubled past has come back to plague our simply sweet lives and was just about to turn it all upside down. He was so understanding from the beginning of all this, telling me that he will always be behind every choice that I make in mending the sorrows of my tormenting past and there he has been through all of the thick and thins.

Deciding to call the lawyers on the victim suit provided for me was a big decision but one I had to do to seek the unanswered questions from my battered heart. The two women at the firm that I spoke to treated me so wonderfully, like long term friends they counseled me not only in the terms of a lawsuit towards Jeffrey but also in the matters of being emotionally and sexually abused. I chose to proceed with the lawsuit at least to make a statement to a man that tried to make a degrading statement about me so long ago. Now it was my turn, I had the choice to turn the tables on him hoping he would feel embarrassed and in the spotlight for everyone's entertainment where he had kept me for so many years.

Winning my lawsuit against him was not enough to heal old wounds, I never got the chance to stand up in front of a jury and tell them how much pain I had endured and still endure throughout the many nightmares I face when darkness hits and the silence of the sleeping household fills my head with pictures of reliving my past with him or the others he sent me too. Or did I even get to hear him confess his guilt and suffer the way I did locked in confinement for many years? No, instead I got to see a picture of Jeffrey with his arms around a very youthful looking teenager, if even that, parading the streets of New York, the very way he had with me and so many other girls long before.

As if it were a public display intended for not only his many victims to see but also a spectacle for the public justice system, it was bold show of insolence laughing in our faces while we all sat by not being able to do anything to help these young girls from the streets still suffering his perverted afflictions. Not much longer there was another story on Jeffrey I saw in the papers of him and Prince Andrew having a stroll together in Central Park. It instantly sparked my concerns for other girls in the very same position I was in so long ago and he was obviously up to the same old tricks, I had to do something now. Not being able to sit by any longer

with the knowledge of being able to help out in some way. I had to tell my story no matter how shameful it was to even speak about. Putting my shame aside I had to derive every bit of courage I could sustain and now I am ready to tell it. The hardest lesson I had failed at learning until later on in my life became my strength, the belief in my inner voice and the ability to speak up. I do have a voice and now the world is going to hear it in my whispered cries for justice. Swept away by a surge of media with one phone call I sent Jeffrey's publicist into frenzy. Not to mention the release of the photos showing the first night that Prince Andrew and I shared together that I so happened to unveil for the public to see.

I spent too much of my life going out of my mind waiting for the rescue that never came until it was too late and then the scars were already imbedded deeply within. Thankfully I am now free from the struggles that nearly destroyed the love inside of my heart. I only wish it could be the same for the other victims, not just of Jeffrey's inflictions but every person who has ever suffered at the hands of another.

I'm here to tell you from my own experience that the moon is yours if that's what you want, all you have to do is stand up and take it. If some girl off the streets of Florida, like me, can stand up against the tyrants that run the deep pockets of our world, than anyone can. Just like I needed to believe that someone stood up for me once like Robbie did long ago, I now stand up for us. For all of us girls, the ones who are still on the streets and think they don't deserve better or it's an unachievable dream to be entitled to more out of life. For all of the beautiful girls who don't see beyond they're outside appearance. For all the girls still trapped in enslavement and unable to get out of the abuse that holds them down. But most of all, I stand up for every girls belief in love, because it is the very savior of my spirit and soul.

The End

Written and Illustrated by Virginia Roberts

EXHIBIT LL

ARTICLES OF INCORPORATION

In compliance with Chapter 617, F.S., (Not for Profit)

ARTICLE I NAME

The name of the corporation shall be: Victims Refuse Silence, Inc.

ARTICLE II PRINCIPAL OFFICE

Principal **street** address:	Mailing address, if different is:
425 North Andrews Ave.	
Suite 2	
Fort Lauderdale, FL 33301	

ARTICLE III PURPOSE

The purpose for which the corporation is organized is: Victims Refuse Silence, Inc. is organized exclusively for charitable and educational purposes including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501(c)(3) of the Internal Revenue Code, or the corresponding section of any future federal tax code. The corporation is organized to provide assistance to victims of sexual abuse as well as victims of human trafficking. Upon the dissolution of Victims Refuse Silence, Inc., assets shall be distributed for one or more exempt purpose within the meaning of section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose.

ARTICLE IV MANNER OF ELECTION The manner in which the directors are elected and appointed: The manner in which the directors are elected or appointed is provided in the bylaws of the Corporation.

ARTICLE V INITIAL OFFICERS AND/OR DIRECTORS

Name and Title: Virginia Roberts, Director
Address: 425 North Andrews Ave.
Suite 2
Fort Lauderdale, FL 33301

Name and Title: Bradley J. Edwards, Director
Address: 425 North Andrews Ave.
Suite 2
Fort Lauderdale, FL 33301

Name and Title: Brittany N. Henderson, Director
Address: 425 North Andrews Ave.
Suite 2
Fort Lauderdale, FL 33301

Name and Title:
Address:

Name and Title:
Address:

Name and Title:
Address:

FILED 14 DEC 23 PM 12:25

Name and Title:______________________ Name and Title:______________________

Address ______________________ Address: ______________________

______________________ ______________________

______________________ ______________________

Name and Title:______________________ Name and Title:______________________

Address ______________________ Address: ______________________

______________________ ______________________

______________________ ______________________

ARTICLE VI REGISTERED AGENT

The **name and Florida street address** (P.O. Box **NOT** acceptable) of the registered agent is:

Name: Bradley J. Edwards

Address: 425 North Andrews Ave., Suite 2
Fort Lauderdale, FL 33301

ARTICLE VII INCORPORATOR

The **name and address** of the Incorporator is:

Name: Brittany N. Henderson

Address: 425 North Andrews Ave., Suite 2
Fort Lauderdale, FL 33301

Having been named as registered agent to accept service of process for the above stated corporation at the place designated in this certificate, I am familiar with and accept ~~the appointment~~ as registered agent and agree to act in this capacity

Required Signature of Registered Agent   12-17-14
Date

I submit this document and affirm that the facts stated herein are true. I am aware that any false information submitted in a document to the Department of State constitutes a third degree felony as provided for in s.817.155, F.S.

Required Signature of Incorporator   12|17|14
Date

2015 FLORIDA NOT FOR PROFIT CORPORATION AMENDED ANNUAL REPORT

FILED
Apr 22, 2015
Secretary of State
CC7801725405

DOCUMENT# N14000011657

Entity Name: VICTIMS REFUSE SILENCE, INC.

Current Principal Place of Business:

425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301

Current Mailing Address:

425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301

FEI Number: 47-2627774

Certificate of Status Desired: Yes

Name and Address of Current Registered Agent:

EDWARDS, BRADLEY J
425 NORTH ANDREWS AVE., SUITE 2
FORT LAUDERDALE, FL 33301 US

The above named entity submits this statement for the purpose of changing its registered office or registered agent, or both, in the State of Florida.

SIGNATURE: ______________________________

Electronic Signature of Registered Agent — Date

Officer/Director Detail :

Title	PRESIDENT, DIRECTOR	Title	VP, DIRECTOR
Name	GIUFFRE, VIRGINIA L	Name	GARVIN, MARGARET A
Address	425 NORTH ANDREWS AVE., SUITE 2	Address	425 NORTH ANDREWS AVE., SUITE 2
City-State-Zip:	FORT LAUDERDALE FL 33301	City-State-Zip:	FORT LAUDERDALE FL 33301
Title	SECRETARY, DIRECTOR		
Name	HENDERSON, BRITTANY N		
Address	425 NORTH ANDREWS AVE., SUITE 2		
City-State-Zip:	FORT LAUDERDALE FL 33301		

I hereby certify that the information indicated on this report or supplemental report is true and accurate and that my electronic signature shall have the same legal effect as if made under oath; that I am an officer or director of the corporation or the receiver or trustee empowered to execute this report as required by Chapter 617, Florida Statutes; and that my name appears above, or on an attachment with all other like empowered.

SIGNATURE: BRITTANY N HENDERSON — DIRECTOR — 04/22/2015

Electronic Signature of Signing Officer/Director Detail — Date

EXHIBIT MM

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO: 15-cv-07433-RWS

VIRGINIA L. GIUFFRE,
Plaintiff.
-vs-
GHISLAINE MAXWELL,
Defendant.
_______________________________________/

425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Thursday, September 8, 2016
8:53 a.m. - 10:30 a.m.

VIDEOTAPED DEPOSITION OF BRITTANY HENDERSON

Taken before Rinat Katz, Reporter, a Notary Public for the State of Florida at Large, pursuant to Notice of Taking Deposition filed in the above-styled cause.

1 APPEARANCES:
2 On Behalf of the Plaintiff:
3 BOEIS, SCHILLER & FLEXNER, P.A.
401 East Las Olas Boulevard, Suite 1200
4 Fort Lauderdale, Florida 33301
Smccawley@bsfllp.com
5 BY: SIGRID MCCAWLEY, ESQUIRE
6 On Behalf of the Plaintiff and Victims Refuse Silence, Inc.:
7
FARMER JAFFE WEISSING EDWARDS FISTO LEHRMAN
8 425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
9 (954) 524-2820
Brad@pathtojustice.com
10 BY: BRADLEY J. EDWARDS, ESQUIRE
11 On Behalf of the Defendant:
12 HADDON, MORGAN & FOREMAN
150 East 10th Avenue
13 Denver, Colorado 80203
(303) 831-7364
14 Jpagliuca@hmflaw.com
BY: JEFFREY PAGLIUCA, ESQUIRE
15
Also Present:
16
Ryan Kick, Videographer
17
18
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22
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1 INDEX OF PROCEEDINGS

6

7 DEFENDANT'S EXHIBITS

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18 (Exhibits Retained by the Court Reporter)

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1 she has continued to try and promote Victims Refuse
2 Silence at every possible chance she gets with -- the
3 story she told me was that someone had come to her
4 door, knocked on the door, selling something or talking
5 about something totally different, and she explained
6 what our mission was and tried to get them to, then, go
7 and spread the word for victims of human trafficking,
8 as well.
9 Q And this would be in Australia this
10 conversation occurred?
11 A Correct.
12 Q Okay. To your knowledge, is VRS incorporated
13 in any fashion in the country of Australia?
14 A It is not.
15 Q To your knowledge, does VRS have any website
16 presence in Australia?
17 A I believe that the internet works everywhere,
18 so I would say yes, because, if you Google Victims
19 Refuse Silence, we do have a website. So I would
20 imagine that that's something that would come up in
21 Australia.
22 Q Okay. Other than the somebody knocking at
23 her door, that conversation, did she report to you
24 anything else that she has done on behalf of Victims
25 Refuse Silence in the last year, let's say?

1 MR. EDWARDS: Objection --
2 THE WITNESS: During this telephone
3 conversation --
4 BY MR. PAGLIUCA:
5 Q Yes.
6 A -- or in general?
7 Q During this telephone conversation?
8 A She did explain that, when she goes to her
9 kids' schools and when she is out, she tries to promote
10 the organization, as well, and just talk to people, and
11 general awareness and understanding to raise -- for
12 issues of human trafficking, yes.
13 Q And did she report anything else to you
14 during this phone conversation?
15 A During this particular conversation?
16 Q Yes.
17 A No.
18 Q Okay. Then, you indicated that you reviewed
19 your file for all the paperwork, and we'll talk about
20 the documents produced in this case in a moment.
21 Can you tell me, other than what has been
22 produced as part of the response to subpoena issued to
23 VRS, what other documents are in the file that you
24 reviewed?
25 A I have saved every piece of mail that has

1 "publication," would be the Facebook page; correct?
2 A In addition to the website, yes.
3 Q Okay. Number 11, documents relating to all
4 appearances. As I understand it, there are no
5 documents that exist that comply with this request;
6 correct?
7 A Correct; to my knowledge.
8 Q Do you know, has anybody on behalf of VRS
9 made a public appearance on behalf of VRS?
10 A I believe that there was a scheduled
11 appearance, yes, one.
12 Q And when was that?
13 A I honestly don't know when that took place.
14 I would imagine in the beginning of 2015.
15 Q And do you know who was scheduled to appear
16 in the beginning of 2015?
17 A Ms. Giuffre.
18 Q And do you know where she was scheduled to
19 appear?
20 A I believe in New York with ABC.
21 Q And that would have also been with Mr.
22 Edwards and Ms. McCawley; is that correct?
23 A I believe so, yes.
24 Q And in fact, she did go to ABC and give a
25 taped interview, correct?

1 MS. MCCAWLEY: Objection.
2 THE WITNESS: It's my understanding, yes.
3 BY MR. PAGLIUCA:
4 Q Okay. Is it your understanding that that was
5 on behalf of VRS?
6 A I do not believe her appearance there was
7 made on behalf of VRS, but I do believe that -- I know
8 that she wanted to promote the charity, so that we
9 could start helping people and that she could start
10 getting her mission out to the public.
11 Q Okay. Number 12, all contacts received by
12 VRS through its website, or otherwise, to schedule -- I
13 think it should say "an event," and "and event."
14 There are none of those, as I understand it?
15 A No, that is not correct. We produced a --
16 yes, we did produce something to you. I'm not sure
17 what the Bates Stamp number is, but it was a contact
18 received by another victim of sexual assault who had
19 reached out to the organization.
20 Q An email, I think it's in December of 2015,
21 maybe; is that what you're referring to?
22 A I believe -- I'm not sure of the date. I
23 guess.
24 Q We'll look at it. And that would be the only
25 contact received by VRS; is that correct?

1 C E R T I F I C A T E OF OATH

2

3 STATE OF FLORIDA

4 COUNTY OF BROWARD

5

6

7 I, Rinat Katz, Reporter, Notary Public, State

8 of Florida, certify that BRITTANY HENDERSON

9 personally appeared before me on the 8th day of

10 September, 2016, and was duly sworn.

11

12 Signed this 22nd day of September, 2016.

13

14

15 ________________________________

Rinat Katz, Reporter

16 Notary Public, State of Florida

Commission No.: FF4576

17 Commission Expires: 04-03-2017

18

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1 CERTIFICATE OF REPORTER

2

3 STATE OF FLORIDA

4 COUNTY OF BROWARD

5

6 I, Rinat Katz, Reporter, certify that I was

7 authorized to and did report the deposition of

8 BRITTANY HENDERSON, that a review of the

9 transcript was requested; and that the transcript

10 is a true and correct record of my stenographic

11 notes.

12 I further certify that I am not a relative,

13 employee, attorney, or counsel of any of the

14 parties, nor am I a relative or employee of any of

15 the parties' attorneys or counsel connected with

16 the action, nor am I financially interested in the

17 action.

18 Dated this 22nd day of September, 2016.

19

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21 ______________________________________

Rinat Katz, Reporter

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Selected docket entries for case 18−2868

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Filed	Document Description	Page	Docket Text
08/09/2019	279 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	2	UNSEALED SUMMARY JUDGMENT RECORD, appendix 5 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628231] [18−2868]
08/09/2019	280 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	39	UNSEALED SUMMARY JUDGMENT RECORD, appendix 6 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628232] [18−2868]
08/09/2019	281 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	113	UNSEALED SUMMARY JUDGMENT RECORD, appendix 7 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628234] [18−2868]
08/09/2019	282 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	179	UNSEALED SUMMARY JUDGMENT RECORD, appendix 8 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628236] [18−2868]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

---X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

---X

15-cv-07433-RWS

Reply Brief in Support of Defendant's Motion for Summary Judgment

Laura A. Menninger
Jeffrey S. Pagliuca
Ty Gee
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
303.831.7364

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TABLE OF AUTHORITIES

Cases

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Treatises

PRELIMINARY STATEMENT

Before the Court reaches the question whether plaintiff can prove falsity and actual malice, it should decide three questions of law, one that narrows considerably the legal issues and two that dispose of the case entirely.

1. It is undisputed Ms. Maxwell, through her agents, sent to various media-representatives—and to no one else—the January 2015 statement. It is undisputed she had no control over any of the media that decided to republish excerpts from the statement. On these facts, under black letter New York law, she is not responsible for these republications. Plaintiff's contrary argument relies on a "foreseeability" doctrine the New York Court of Appeals has specifically rejected. Summary judgment should enter in favor of Ms. Maxwell as to any republication.

2. Under the New York Constitution, whether a statement is constitutionally nonactionable opinion depends upon, among other things, an examination of the full context of the communication and consideration of the setting surrounding it. The January 2015 statement, making no reference to specific allegations, explains *why* the author believes plaintiff's allegations are "obvious lies": "Each time the story is re told [sic] it changes with new salacious details . . . ." It is an expression of a venerable opinion: when a person falsely cries wolf previously, others are free to opine she is telling falsehoods now. This is nonactionable opinion.

3. Under New York law, a statement made pertinent to good faith anticipated litigation is nonactionable. The statement was sent exclusively to the media representatives, and contained a clear message: the media should not republish plaintiff's "obvious lies," else Ms. Maxwell would sue them. Such a statement is nonactionable.

If the Court reaches the question of falsity and actual malice, the Rule 56 record establishes plaintiff cannot prove falsity and actual malice by clear and convincing evidence.

ARGUMENT

I. Ms. Maxwell is not liable for republications of the January 2015 statement.

Under black letter New York law, liability for republication of an allegedly defamatory statement "must be based on real authority to influence the final product." *Davis v. Costa-Gavras*, 580 F. Supp. 1082, 1096 (S.D.N.Y. 1984). "[W]here a defendant 'had no actual part in composing or publishing,' he cannot be held liable." *Id.* (citing *Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906)); *accord Geraci v. Probst*, 938 N.E.2d 917, 921 (N.Y. 2010). "[*C]onclusive evidence of lack of actual authority* [is] sufficiently dispositive that *the [trial court] 'ha[s] no option but to dismiss the case* . . . .'" *Id.* (emphasis supplied; quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

It is undisputed Ms. Maxwell and her agents had no ability to control and did not control whether or how the media-recipients would use the statement. DOC. 542-7, Ex.J ¶¶ 2-3; *id.*, Ex.K ¶ 24. Unsurprisingly, plaintiff has offered no evidence of such control. *A fortiori* this Court "ha[s] no option but to dismiss the case," *id.* (internal quotations omitted), to the extent it is founded upon the media's republication of the statement.

A. Plaintiff's argument against summary judgment is substantially groundless.

A legal argument is frivolous if it is presented contrary to a "long line of authorities" and the "fundamental principles"[1] of the underlying substantive law. Plaintiff Giuffre's argument opposing summary judgment as to republication is frivolous.

The New York Court of Appeals in *Geraci* followed a long line of New York cases holding that a defamation defendant is not liable for republication of his allegedly defamatory statement unless he had "actual authority" to control the decision to republish: "Our

[1] *Porky Prods. v. Nippon Exp. U.S.A.*, 1 F.Supp.2d 227, 234 (S.D.N.Y. 1997), *aff'd*, 152 F.3d 920 (2d Cir. 1998).

republication liability standard has been consistent for more than one hundred years." *See Geraci*, 938 N.E.2d at 921 (footnote omitted). Indeed, the *Geraci* court observed, the New York Court of Appeals in *Schoepflin v. Coffey*,[2] a case decided in 1900, held:

> "*It is too well settled to be now questioned* that one who . . . prints and publishes a libel[] is not responsible for its voluntary and unjustifiable repetition, without his authority or request, by others over whom he has no control and who thereby make themselves liable to the person injured, and that *such repetition cannot be considered in law a necessary, natural and probable consequence of the original slander or libel.*"

938 N.E.2d at 921 (emphasis supplied; quoting *Schoepflin*, 56 N.E. at 504).

The cases in which this Court and its sister courts in this Circuit assiduously have followed this line of New York cases are legion.[3] The Second Circuit was in the vanguard.[4]

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[2]56 N.E. 502 (N.Y. 1900).

[3]*See Egiazaryan v. Zalmayev*, 880 F. Supp. 2d 494, 501 (S.D.N.Y. 2012) ("[t]he original publisher is not liable for republication where he had 'nothing to do with the decision to [republish] and [he] had no control over it.'") (quoting *Rinaldi v. Viking Penguin, Inc.*, 425 N.Y.S.2d 101, 104 (1st Dep't 1980), *aff'd*, 420 N.E.2d 377 (N.Y. 1981)); *Egiazaryan v. Zalmayev*, No. 11 CIV. 2670 PKC, 2011 WL 6097136, at *5 (S.D.N.Y. Dec. 7, 2011) (same); *Davis v. Costa-Gavras*, 595 F. Supp. 982, 988 (S.D.N.Y. 1984) ("Under New York law, liability for a subsequent republication must be based on real authority to influence the final product, not upon evidence of acquiescence or peripheral involvement in the republication process."); *Davis*, 580 F. Supp. at 1094 (original publisher not liable for injuries caused by the republication "'absent a showing that they approved or participated in some other manner in the activities of the third party republisher'") (quoting *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557, 560 (N.Y. 1980)); *Croy v. A.O. Fox Mem'l Hosp.*, 68 F. Supp. 2d 136, 144 (N.D.N.Y. 1999) ("The original author of a document may not be held personally liable for injuries arising from its subsequent republication absent a showing that the original author approved or participated in some other manner in the activities of the third-party republisher.") (citations omitted); *Cerasani v. Sony Corp.*, 991 F. Supp. 343, 351 (S.D.N.Y. 1998) ("a libel plaintiff must allege that the party had authority or control over, or somehow ratified or approved, the republication").

[4]*See Folwell v. Miller*, 145 F. 495, 497 (2d Cir. 1906) (affirming directed verdict in favor of managing editor: "when it appears affirmatively that he was not on duty [upon receipt of libelous matter and its republication], and could not have had any actual part in composing or publishing, we think he cannot be held liable without disregarding the settled rule of law by which no man is bound for the tortious act of another over whom *he has not a master's power of control*") (emphasis supplied), *quoted with approval in Davis I*, 580 F. Supp. at 1096; *Cerasani*, 991 F. Supp. at 351.

In the face of this uninterrupted line of New York state (and federal) cases dating back to the nineteenth century powerfully establishing a bright line rule regarding republication liability, plaintiff Giuffre manages what amounts to a—frivolous—murmur of opposition. She claims there are "[t]wo standards" in New York law: one "older," and one "more modern." Resp. 28. The "older" standard, plaintiff says, is represented by the legion of cases we have cited. The "more modern formulation"—where can it be found? Why, in one place: a treatise on defamation. *Id.* (citing *Sack on Defamation* § 2.7.2, at 2-113 to -114 (4th ed. 2016)). It surely is frivolous to argue that a treatise creates a republication-liability standard that is separate from, "more modern" than, and supersedes the New York Court of Appeals' 2010 decision in *Geraci* and this Court's 2012 decision in *Egiazaryan*.

Trying to build on this start, plaintiff argues, "New York appellate courts have *repeatedly held* than an individual is liable for the media publishing that individual's defamatory press release." Resp. 28 (emphasis supplied). Even if we accept plaintiff's mischaracterization of the January 2015 statement as a "press release,"[5] her argument still would be meritless. To begin with, when plaintiff says the New York appellate courts have "repeatedly" supported her claimed rule of law, she means . . . twice. And an examination of those two cases reveals she is quite wrong and, worse, has advanced a seriously misleading argument. Neither case involved, as here, a motion for summary judgment. In both cases, the New York appellate division affirmed the denial of a motion to dismiss under the state's equivalent of Federal Rule of Civil Procedure 12(b)(6). *See Levy v. Smith*, 18 N.Y.S.3d 438, 439 (2d Dep't 2015); *National Puerto Rican Day Parade, Inc. v. Casa Pubs.* ("*NPR*"), 914 N.Y.S.2d 120, 122-23 (1st Dep't 2010).

[5] As discussed in This Reply, at 16-19, the January 2015 statement would be a strange "press release," as it threatened to sue the very press to which it was "releasing" information.

This argument, too, is frivolous. Despite plaintiff's baseless claim there is an "old" formulation and a "more modern" formulation of republication-liability law in New York, both cases she cites *applied the same "old" standard used by the New York Court of Appeals in* Geraci*, by this Court in the two* Egiazaryan *cases*, and by us in our Memorandum of Law in support of Ms. Maxwell's motion for summary judgment. *See Levy*, 18 N.Y.S.3d at 439 (citing *Geraci* and *Schoepflin*); *NPR*, 914 N.Y.S.2d at 594-95 (citing *Hoffman v. Landers*, 537 N.Y.S.2d 228, 231 (2d Dep't 1989) (citing *Schoepflin*)).

Both the courts in *Levy* and *NPR* applied the *Geraci* standard and the 12(b)(6) standards, e.g., assuming the pleaded facts were true. They concluded it was possible to infer from the complaints' allegations that the defendant caused the republications. Accordingly, they denied the motions to dismiss. *See Levy*, 18 N.Y.S.2d at 439; *NPR*, 914 N.Y.S.2d at 123. It was improper for plaintiff to cite these cases without disclosing they are 12(b)(6) cases in which the courts applied the *Geraci* republication rule and inferred facts from the pleaded allegations.

B. New York state and federal courts have rejected liability for republication based on "foreseeability."

Plaintiff cites section 576 of the Restatement (Second) of Torts for the proposition that if republication was foreseeable, then the defendant is the cause of any special damages from the republication. This argument is frivolous. As an initial matter, plaintiff has pleaded no special damages. *See* Doc.1; Doc.23 at 23; Doc.37 at 17.

Regardless, the New York Court of Appeals in *Geraci rejected* the Restatement's foreseeability doctrine. *See* 938 N.E.2d at 921-22 (noting that section 576's foreseeability standard "is not nearly as broad as plaintiff . . . suggest[s]" and "[t]hat ***we did not endorse*** such a broad [Restatement] standard of foreseeability in *Karaduman* is evident from our decision the following year in *Rinaldi*") (emphasis supplied).

While trying to distinguish this Court's decision in *Davis*, plaintiff fails to disclose that *Davis* itself—decided 26 years before *Geraci*—also *rejected* plaintiff's foreseeability argument. The *Davis* plaintiffs, like plaintiff Giuffre here, also asserted republication liability, despite defendant's lack of participation, on the ground "he could reasonably have foreseen that republication would occur." 580 F.Supp. at 1096. This Court, relying on *Karaduman*, was unpersuaded: The New York Court of Appeals "has not applied the foreseeability standard suggested by plaintiffs in prior libel cases in which such a standard would have been relevant, if not controlling." *Id.* This Court noted: The jurisdictions that have adopted a foreseeability standard "have refused to hold responsible a defendant with no control or influence over the entity that actually republished the statement." *Id.* Plaintiff's failure to disclose this Court's holdings in *Davis* is a notable lapse in candor.

C. Plaintiff's purported application of the *Geraci* rule is misleading and wrong.

Plaintiff eventually purports to apply the "old" standard, that is to say, the controlling law in the state of New York. She argues Ms. Maxwell "authorized" the January 2015 statement, "paid money to her publicist to convince media outlets to publish it," "request[ed]" its publication, "made a deliberate decision to publish her press release," "actively participated" in "the decision to publish her press release," was "active" in "influencing the media to publish" the statement, and "approved of" and "pushed for" the publication of the statement. Resp. 30-31. These argument-manufactured facts have no record support.

In applying the controlling law, plaintiff wittingly makes a mess of it. She disingenuously suggests any help Ms. Maxwell gave to help her lawyer prepare the January 2015 statement and her signing-off on it are the equivalent of requesting, authorizing and controlling its *republication*. That isn't the law. The "authority" required for republication liability is the "actual authority . . . *to decide upon or implement*" the republication. 580 F.Supp. at 1095

(emphasis supplied; citing *Rinaldi*, 420 N.E.2d at 382). Judge Sofaer studied *Rinaldi*'s holding, and noted republication liability must be based on a "decision" by the defendant to republish and must focus on "real authority to influence the final product, *not upon evidence of acquiescence or peripheral involvement in the republication process*." *Id.* at 1096 (emphasis supplied). Accordingly, Judge Sofaer held, when there is "conclusive evidence of lack of actual authority" this is "dispositive" of republication liability and the trial court "'ha[s] *no option but to dismiss the case* against the [defendant]." *Id.* (emphasis supplied; quoting *Rinaldi*, 420 N.E.2d at 382).

There is no evidence Ms. Maxwell "paid money to her publicist to convince" the media to publish her statement; this is why plaintiff cites no evidence to support that assertion. *See* Resp. 30. Mr. Gow's email containing the statement says nothing to "convince" the media to publish the statement. *See* Doc.542-6, Ex.F. There is no evidence Ms. Maxwell was "active" in "influencing the media to publish" it; nor is there any evidence she "pushed for" or "requested" its publication; this is why plaintiff cites no evidence to support these assertions. *See id.* 31.

Indeed, plaintiff has zero evidence Ms. Maxwell or her agents ever did anything to urge or request any media to publish the statement. Mr. Gow presented the January 2015 statement via email to six to thirty media representatives; it was not sent to anyone else; in the email he told the journalists he was presenting a "quotable statement" "on behalf of" Ms. Maxwell and "[n]o further communication will be provided." Doc.542-6, Ex.F. It is undisputed Ms. Maxwell and her agents had no control over the media that republished portions of the statement. Doc.542-7, 542-7, Ex.J ¶¶ 2-3; *id.*, Ex.K ¶ 24.

Plaintiff argues "a jury" should decide whether Ms. Maxwell "authorized or intended" the statement to be republished, or "approved of, and even participated, in" its republication. Resp. 30-31. All plaintiffs want to get to "a jury." The summary-judgment question is whether they deserve to. Plaintiff has offered no evidence to put before a jury on the dispositive *Geraci*

question: whether Ms. Maxwell affirmatively authorized or requested a person or entity "over whom [s]he has . . . control," 938 N.E.2d at 921. The only new argument plaintiff makes in her entreaty to see "a jury" is that she should be permitted to prove Ms. Maxwell's "complicity." As with her other factually bereft arguments, the complicity argument awaits plaintiff's introduction of facts to support it. Having failed to do so, plaintiff cannot avoid summary judgment.

Plaintiff labors in vain to turn the Barden Declaration into "disputed issues of fact." For there to be a disputed factual issue, plaintiff would need to introduce evidence disputing his sworn statements. She has not done so. In any event, the Barden Declaration is all but irrelevant to the central, dispositive republication question: whether Ms. Maxwell is liable for the media's republication of her statement, where they did so without her authority or request and where she and her agents had "no control"[6] over the media. On this question we cited to the Barden Declaration for one evidentiary fact: Messrs. Barden and Gow had no control over the media.[7] *See* Doc.542-7, Ex.K ¶ 24, *cited in* Memo. of Law 14.[8] Plaintiff has offered no admissible evidence disputing this fact.

"[T]here is no issue for trial unless there is sufficient evidence favoring the nonmoving party for a jury to return a verdict for that party." *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 249 (1986). It is one thing to argue in conclusory fashion, as plaintiff does, that "a jury" should decide a factual question. It is quite another to identify evidence in the Rule 56 record that raises a genuine question of material fact, which plaintiff does not do. Summary judgment is warranted.

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[6]*Geraci*, 938 N.E.2d at 921.

[7]As discussed in Argument I.D., below, we cited more plenarily to the Barden Declaration in connection with a different point—the particular unfairness of subjecting Ms. Maxwell to liability when the media selectively quoted portions of the January 15 statement.

[8]In the Memorandum, we erroneously cited to ¶ 24 of Exhibit J; we intended to cite to ¶ 24 of Exhibit K (Doc.542-1, Ex.K), which is Mr. Barden's declaration.

D. Subjecting Ms. Maxwell to liability for the media's republication of excerpts they unilaterally selected is particularly unfair.

It is undisputed that no one ever republished *in toto* the January 2015 statement and that various media unilaterally selected portions of the statement to republish. We said on page 14 of our Memorandum that the media's "selective, partial republication of the statement is *more problematic* yet" (emphasis altered). That is to say, as improper as it is to hold a publisher of a statement liable for republications over which she had no control, worse is it to make her liable for selective, partial republications of her statement. We relied on the holding in *Rand v. New York Times Co.*, 430 N.Y.S.2d 271, 275 (1st Dep't 1980), that a publisher cannot be charged with a republisher's "editing and excerpting of her statement." Memo. of Law 14.

Plaintiff argues that our position is "absurd on its face" because "[i]t would mean . . . a defamer could send to the media a long attack on a victim with one irrelevant sentence and, when the media quite predictably cut that sentence, escape liability." Resp. 32. This argument has two erroneous assumptions. One is that the "defamer" can "escape liability." Not true. An original publisher remains liable for her defamation. We are concerned here with *republication.* The second wrong assumption is that the original publisher must always remain liable for any republication. *Geraci* rejects that view: Under New York law "each person who repeats the defamatory statement is responsible for the resulting damages." 938 N.E.2d at 921.

The effort by plaintiff to distinguish *Rand* is meritless. She argues the media's republication of the January 2015 statement actually was not a republication at all, just an original publication. Resp. 32. *That* argument is "absurd on its face," *id.*, since there is no dispute Ms. Maxwell did not control the media's decision to republish (excerpts from) the statement. Plaintiff next argues the media did not "edit[]" or "tak[e] . . . quote[s] out of context." *Id.* Plaintiff could not be more wrong. As she concedes, all republications of the statement by the

media were selective, partial republications of the statement. Any such selective, partial republication by definition took those excerpts "out of context." This is so because Mr. Gow informed the media in his email that he was providing "a quotable statement," Doc.542-6, Ex.F, not a statement "from which you, the media, are free to excerpt as you please."

More importantly, as Mr. Barden explained, selectively excerpting the statement substantially altered his message. *See id.*, Ex.K ¶ 20. For example, when he said in the third paragraph that plaintiff's claims are "obvious lies," it followed two paragraphs in which he explained *why* it was obvious the new claims are lies. *See id.*, Ex.K ¶¶ 19-22. Excerpting and republishing only the "obvious lies" phrase—as plaintiff did in her complaint—certainly gives the reader a different understanding than if the media had republished the entire statement. As *Rand* held: A defendant cannot be liable for the republication of derogatory but constitutionally protected opinion "when the foundation upon which that opinion is based is omitted. The defamatory remark should be read against the background of its issuance." 430 N.Y.S.2d at 275 (internal quotations omitted).

Plaintiff argues: "A jury could reasonably conclude that [Ms. Maxwell's] statement that Ms. Giuffre's *claims of child sexual abuse* are 'obvious lies' is not a rhetorical device, nor hyperbole, but a literal and particular affirmation that [plaintiff] lied." Resp. 33 (emphasis supplied). We italicize plaintiff's rhetorical sleight of hand. As plaintiff knows, nowhere did the January 2015 statement specify which of plaintiff's countless allegations are "obvious lies." Indeed, this is the problem with plaintiff's case: since the statement specified no particular allegations as obvious lies, plaintiff believes she is entitled to "prove" the truth of every allegation she ever has made about her alleged experience as a "sex slave." What Mr. Barden's declaration makes clear is he deliberately made no reference to any specific allegation by plaintiff. He had a bigger target: plaintiff's credibility. He used the statement to show plaintiff's

behavior is that of a liar, i.e., one who increasingly embellishes her story, and her allegations become more and more outlandish, so that by January 2015 she was claiming to have had sex with a well respected Harvard law professor, Alan Dershowitz. *See* Doc.542-7, Ex.K ¶¶ 19-22.

Contrary to plaintiff's argument, "even apparent statements of fact may assume the character of statements of opinion, and thus be privileged, when made in public debate . . . or other circumstances in which an audience may anticipate the use of epithets, fiery rhetoric or hyperbole." *Steinhilber v. Alphonse*, 501 N.E.2d 550, 556 (N.Y. 1986) (internal quotations and brackets omitted). That was the case here. Plaintiff falsely—and, as Judge Marra held, "unnecessar[ily]"[9]—alleged in lurid detail that Ms. Maxwell had sexually abused her. The six to thirty journalists would have anticipated a "fiery" denial of the allegations. Regardless, the statement overall was constitutionally protected opinion grounded on facts disclosed to the journalists: plaintiff's increasingly outlandish and inconsistent stories, her newly embellished allegations, and her increasingly lurid and salacious enhancements of her earlier allegations.

E. Mr. Barden's declaration is perfectly proper.

Plaintiff makes a plethora of complaints about Mr. Barden's declarations. None has any merit. She objects to Mr. Barden's declaration of his intent and purposes for preparing the January 2015 statement because, she says, this implicates the attorney-client privilege. That is untrue. His intent and purposes are by definition *not* attorney-client communications and do not implicate such communications; they are attorney work product,[10] which he is free to disclose.[11]

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[9]Doc.542-5, Ex.E, at 5.

[10]*Travelers Indem. Co. v. Northrop Grumman Corp.*, No. 12 CIV. 3040 KBF, 2013 WL 3055437, at *3 (S.D.N.Y. Apr. 22, 2013) (identifying work product as including defense counsel's "mental impressions, thought processes and strategies connected with [the] defense") .

[11]*See In re China Med. Techs., Inc.*, 539 B.R. 643, 658 (S.D.N.Y. 2015)

She objects he is "non-deposed." But Mr. Barden was the third-listed potential witness in our Rule 26(a)(1)(A) disclosure, served on plaintiff a year ago; the disclosure said he "has knowledge concerning press statements by . . . Defendant in 2011-2015 at issue in this matter."[12] Plaintiff was free to depose him; that she chose not to was her own tactical decision. Finally, plaintiff argues "there are factual disputes" regarding the declaration. But plaintiff identified no such factual disputes relating to the declaration. A party opposing summary judgment cannot create a dispute by arguing, which is all plaintiff does. *See* Resp. 35-38.

F. Plaintiff effectively has confessed Arguments I.B. and I.C. of the Memorandum.

Argument I.B. of the Memorandum contends the First Amendment bars liability for republication by media organizations of the January 2015 statement. *See* Memo. of Law 16-17. Argument I.C. contends that under *Geraci* plaintiff is barred from introducing into evidence any of the media organizations' republication of the January 2015 statement. *See id.* at 17-18. Plaintiff offers no resistance to these arguments. We respectfully request that the Court consider these arguments confessed. *See, e.g.*, *Cowan v. City of Mount Vernon*, 95 F. Supp. 3d 624, 645-46 (S.D.N.Y. 2015) (citing cases).

II. The January 2015 statement is constitutionally protected opinion.

In deciding whether a statement is opinion the New York Constitution requires application of "the widely used four-part *Ollman*[13] formula," *Immuno AG v. Moor-Jankowski,* 567 N.E.2d 1270, 1274 (N.Y. 1991). *See id.* at 1274, 1277-78, 1280-82 (noting *Steinhilber*'s adoption of formula). We addressed each of the four *Ollman* factors. The plaintiff avoids this analysis, choosing merely to block-quote large portions of this Court's Rule 12(b)(6) order. That

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[12] Menninger Decl. EXHIBIT NN, at 2.

[13] *Ollman v. Evans*, 750 F.2d 970 (D.C. Cir. 1984).

is a mistake. *Immuno AG* is the seminal case prescribing the analysis to be used in a *summary-judgment proceeding* for assessing whether under the New York Constitution a statement is absolutely protected as opinion.

Instead of addressing the four factors, plaintiff simply relies on this Court's 12(b)(6) order. The Court's order does not control. In deciding the Rule 12(b)(6) motion, the Court assumed the complaint's allegations were true and drew all reasonable inferences in plaintiff's favor. In this proceeding, plaintiff is not entitled either to the assumption or the inferences. The opinion-versus-fact question will be controlled by the Rule 56 record.

Relying on the Court's order, plaintiff argues that the question whether the three allegedly defamatory sentences are opinion or fact is controlled by *Davis v. Boeheim,* 22 N.E.3d 999 (N.Y. 2014), and *Green v. Cosby,* 138 F. Supp. 3d 114 (D. Mass. 2015). *See* Resp. 38. *Davis* was an appeal from a 12(b)(6) dismissal. This procedural posture was critical to its decision:

> [D]efendants argue that because a reader could interpret the statement as pure opinion, the statement is as a consequence, nonactionable and was properly dismissed [pursuant to a pre-answer motion]. However, on a motion to dismiss we consider whether any reading of the complaint supports the defamation claim. Thus, although it may well be that the challenged statements are subject to defendants' interpretation, the motion to dismiss must be denied if the communication at issue, taking the words in their ordinary meaning and in context, is also susceptible to a defamatory connotation. We find this complaint to meet this minimum pleading requirement.

Davis, 22 N.E.3d at 1006-07 (internal quotations, brackets, ellipsis and citations omitted).

Green was a decision on the defendant's motion to dismiss. The case was decided under *California* and *Florida* defamation law. *See* 138 F. Supp. 3d at 124, 130, 136-37. The court made it clear the 12(b)(6) procedural posture was critical to its decision: "At this stage of the litigation, the court's concern is whether any fact contained in or implied by an allegedly defamatory statement is susceptible to being proved true or false; if so capable, Defendant cannot avoid application of defamation law by claiming the statement expresses only opinion." *Id.* at 130.

In the case at bar, application of the four *Steinhilber* factors on the Rule 56 record compels a different conclusion. The complaint alleges three sentences in the January 2015 statement are defamatory: in the first paragraph of the statement, plaintiff Giuffre's allegations are "untrue"; in the same paragraph, the "original allegations" have been "shown to be untrue"; and in the third paragraph, plaintiff's "claims are obvious lies."[14] Doc.1 ¶ 30.

Factor 1: Indefiniteness and ambiguity. On the face of the complaint in a 12(b)(6) proceeding, the words "untrue" and "obvious lies" might be susceptible of "a specific and readily understood factual meaning," Doc.37 at 9. This is especially true if it is taken out of context, e.g., extracted from the statement. But this approach is forbidden. *See, e.g., Law Firm of Daniel P. Foster, P.C. v. Turner Broad. Sys.*, 844 F.2d 955, 959 (2d Cir. 1988).

The first sentence—"[t]he allegations made by [plaintiff] against [Ms. Maxwell] are untrue"—is indefinite and ambiguous because it is wholly unclear which "allegations" are being referenced. The second sentence—"[t]he original allegations . . . have been fully responded to and shown to be untrue"—also is indefinite and ambiguous for the same reason. Additionally, it is unclear what are the "original" allegations. It is unclear what is meant by "shown to be untrue." What one person may believe is a fact shown to be untrue, another person may believe is a fact not (sufficiently) shown to be untrue. The existence of God, climate change and existence of widespread voter fraud in the election are examples of this. The third sentence—

[14]Ms. Maxwell testified in her deposition that she "know[s]" plaintiff is a "liar." This testimony, plaintiff argues, "contradict[s]" our contention that the three allegedly defamatory sentences in the July 2015 statement are opinion. Resp. 39-40. Plaintiff's argument is a *non-sequitur*. Ms. Maxwell's 2016 deposition testimony in which she disclosed all the reasons she believes plaintiff has uttered a plethora of false allegations is irrelevant to whether the three sentences in the July 2015 statement, prepared by Mr. Barden to respond to the joint-motion allegations, are opinions.

"[plaintiff's] claims are obvious lies"—also is indefinite and ambiguous. An "obvious lie" to one person is not an "obvious lie" to another.

Factor 2: Capable of being characterized as true or false. On the 12(b)(6) record, the Court held the three statements "are capable of being proven true or false." Doc.37 at 9. As a general question of law, one person's statement that another person's allegations are "untrue" or are "obvious lies" is not necessarily capable of being proved true or false—regardless of the subject matter of the opined "untruths" or "lies." *See Rizzuto v. Nexxus Prod. Co.*, 641 F. Supp. 473, 481 (S.D.N.Y. 1986), *aff'd*, 810 F.2d 1161 (2d Cir. 1986); *Telephone Sys. Int'l v. Cecil*, No. 02 CV 9315(GBD), 2003 WL 22232908, at *2 (S.D.N.Y. Sept. 29, 2003); Memo. of Law 35 (citing cases). As *Steinhilber* observed, "even apparent statements of fact may assume the character of statements of opinion, and thus be privileged." 501 N.E.2d at 556.

At least two of plaintiff's CVRA allegations cannot be proven true or false (only two such allegations are needed in order to render the January 15 statement an opinion). We have identified two such allegations in the joinder motion: that Ms. Maxwell "appreciated the immunity granted" to Epstein, and that she "act[ed] as a 'madame' for Epstein." Memo. of Law 22. Plaintiff does not dispute this. The result is that the January 15 statement's assertion that plaintiff's "allegations" and "claims" in the joint motion are "untrue" or "obvious lies" is by definition an opinion. It cannot be proven true or false whether Ms. Maxwell "appreciated" Epstein's immunity or whether she "acted as a madame." Indeed, it seems quite obvious that the joinder-motion allegations about "appreciation" and "madame" *are themselves opinion*.

In the statement, Mr. Barden on behalf of Ms. Maxwell also says plaintiff's "original allegations . . . have been fully responded to and shown to be untrue." Doc.542-6, Ex.F. This cannot be proven true or false. The "full response" to the original allegations is a reference to the "Statement on Behalf of Ghislaine Maxwell" issued March 9, 2011, in response to plaintiff's

allegations contained in media stories, including the Churcher articles. *See* Doc.542-3, Ex.C. Whether the 2011 statement "fully" responded to the original allegations and whether it "showed" the original allegations to be untrue are pure (argumentative) opinion. "[O]bvious lies" on its face is an opinion. The "obviousness" of a lie simply cannot be proven true or false.

Factor 3: The full context of the statement. Three contextual facts are revealed by the Rule 56 record. **One**, the email transmitting the statement to the media-representatives—along with the third-person references to Ms. Maxwell—told them Ms. Maxwell did not prepare the statement: "Please find attached a quotable statement *on behalf of* Ms. Maxwell." Doc.542-6, Ex.F (emphasis supplied). It is undisputed that in fact Mr. Barden prepared the bulk of it and ultimately approved and adopted as his work all of it. Doc.542-7, Ex.K ¶ 10.

Two, Mr. Barden's statement issued on behalf of his client would not be a traditional press release solely to disseminate information to the media; this is why he did not request Mr. Gow or any other public relations specialist to prepare or participate in preparing the statement. *Id.*, Ex.K ¶ 15. The statement was a broad-brush communique to the media about plaintiff and her new allegations; it was not to be a "point by point" rebuttal of each new allegation. *Id.*, Ex.K ¶ 13. The logic and approach to preparing the statement were simple: compare plaintiff's prior allegations and conduct in telling her story with her current allegations and conduct. *See generally id.*, Ex.K ¶ 13. When he wrote the statement, he knew of plaintiff's 2011 allegation that she had *not* had sex with Prince Andrew and he knew of her CVRA allegation that she *did* have sex with him. *Id.*, Ex.K ¶ 14. Also within his knowledge was the story she had told Churcher before March 2011—a story that was far *less* provocative and salacious than the one she included in the joinder motion. *See id.*, Ex.K ¶ 5; *compare* Docs.542-1 & 542-2, Exs.A & B (Churcher articles published March 2011) *with* Doc.542-4, Ex.D (plaintiff's joinder motion containing dramatically different and more lurid and salacious allegations).

Mr. Barden's approach provides critical context to explaining how the statement builds a logical argument that the new allegations are false. It first notes plaintiff's "original allegations"; then it points out how the story changed and was embellished over time, "now" with allegations that plaintiff had sex with a prominent and highly respected Harvard law professor ("Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders . . . ."). The argument builds up to the opinion in the third paragraph: "[Plaintiff's] claims are obvious lies and should be treated as such . . . ." Doc.542-6, Ex.F. *See generally id.*, Ex.K ¶¶ 13-22. This third paragraph—and the threat in the fourth paragraph to sue the media for republication of plaintiff's falsehoods—confirms what is plain from the statement itself: it was not a traditional press release.

Three, the statement was intended to respond (via denial) to the media-recipients' requests for a reply to the new CVRA joinder-motion allegations. *Id.* ¶¶ 8, 10, 16. But more than that, it was intended to be "a shot across the bow" of the media. *Id.* ¶ 17. The logical argument was created to (a) persuade the media-recipients that they needed to "subject plaintiff's allegations to inquiry and scrutiny"; (b) explain to the media-recipients how it was "obvious" that plaintiff "had no credibility" because of her shifting story and increasingly lurid and salacious allegations as time went on, many of which (e.g., the allegations of sex with Prince Andrew and Professor Dershowitz) on their face appear far-fetched,[15] and (c) warn the media-

[15]Since the CVRA joinder motion, there has emerged a substantial amount of evidence—some from plaintiff's own pen—that plaintiff's allegations about having been "forced" to have sex with prominent individuals are falsehoods. A telling example is a series of emails between plaintiff and reporter Churcher when plaintiff was working on negotiating a book deal about her alleged experiences and Churcher was trying to help her. On May 10, 2011, plaintiff tells Churcher she cannot remember whom she had told Churcher she had had sex with. Churcher responds responds, "Don't forget Alan Dershowitz," which Churcher says is a "good name for [plaintiff's] pitch" to her literary agent. It is clear neither Churcher nor plaintiff believed plaintiff

(footnote cont'd on next page)

recipients that they republished plaintiff's obvious falsehoods against Ms. Maxwell at their legal peril. *See id.* ¶¶ 13, 16, 17, 20.

As the New York Court of Appeals observed, the context of a statement often is the "key consideration" in fact vs. opinion cases. *Davis*, 22 N.E.3d at 1006. So it is here. As *Davis* suggested, the three challenged statements are "subject to [Ms. Maxwell's] interpretation," *id.* at 1007; *accord Sweeney v. Prisoners' Legal Servs. of N.Y.*, 538 N.Y.S.2d 370, 371-72 (3d Dep't 1989). The context of the January 2015 statement makes clear that the characterization of plaintiff's allegations and claims as "untrue" or "obvious lies" are ultimate opinions—conclusions—drawn from disclosed facts.

Factor 4: The broader setting surrounding the statement, including conventions that might signal to readers that the statement likely is opinion and not fact. It is undisputed that the January 2015 statement was sent exclusively to more than six and fewer than thirty media representatives, each of whom expressly had requested from Mr. Gow that he provide them with Ms. Maxwell's reply to the new joint-motion allegations. Doc.542-7, Ex.K ¶¶ 8, 10. As was obvious from the statement, it was not a traditional press release, as such a release does not explain—lawyer-like—why new allegations when measured against previous allegations lack credibility. Nor does a traditional release threaten to sue the media to whom the release is sent. The media representatives upon receiving the January 2015 statement would have understood it was presenting an (opinionated) argument that plaintiff was not credible because of her

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had had sex with Professor Dershowitz, since (a) Churcher suggests that he would be a "good name" to "pitch" *because* of his prominence ("he [represented] Claus von Bulow and a movie was made about that case…title was Reversal of Fortune"), and (b) Churcher states, "We all *suspect* [Professor Dershowitz] is a pedo[phile] and tho *no proof of that*, you probably met him when he was hanging put w [Epstein]." Menninger Decl., EXHIBIT.OO, at Giuffre004096-97 (emphasis supplied).

inconsistent and shifting sex abuse story and her increasingly lurid allegations against more and more prominent individuals. And they would have understood that these characteristics of a storyteller undermine her credibility and *ergo* the credibility of her new allegations.

In its 12(b)(6) order the Court said the three sentences have the effect of denying plaintiff's story but "they also clearly constitute fact to the reader." The ruling is affected in two ways by the Rule 56 record. Based on the foregoing discussion of the evidence, the three sentences clearly constitute (argumentative) opinions of Mr. Barden on behalf of Ms. Maxwell.

Though the Court did not discuss who is "the reader," this is important in *Steinhilber* Factor 4." Under settled defamation-opinion law, an allegedly defamatory statement is to be viewed "from the perspective of the audience to whom it is addressed." *Dibella v. Hopkins*, No. 01 CIV. 11779 (DC), 2002 WL 31427362, at *2 (S.D.N.Y. Oct. 30, 2002). Here, "the reader" is six to thirty journalists. They could not have read the July 2015 statement—or the three allegedly defamatory sentences—the same way it was read by these journalists' audience, i.e., the general public. This is because, as plaintiff implicitly concedes, these journalists only republished excerpts—and not the entirety of the statement, which would have given context to the three sentences. It is axiomatic that an out-of-context republication of the three sentences—without the rest of the statement—would deprive the reader of the logic and reasoning behind the opinionated conclusion that plaintiff was making "untrue" allegations and telling "obvious lies."

III. The pre-litigation privilege bars this action.

A. The privilege applies to the January 2015 statement.

Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction[16]) before the commencement of litigation are privileged and "no cause of action for defamation can be based on those statements," *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015). The facts that must be established, therefore, are (a) a statement, (b) that is pertinent to a good faith anticipated litigation, and (c) by attorneys or their agents under their direction. We did this. *See* Memo. of Law 6-8, 33-38; Doc.542-7, Ex.K ¶¶ 8-30. For example, Mr. Barden (a) drafted the vast majority of the January 2015 statement and approved and adopted all of it, (b) directed Mr. Gow to send it to the media representatives who had requested Ms. Maxwell's reply to plaintiff's joint-motion allegations, (c) in the statement threatened legal action again these media representatives, and (d) at the time of the statement "was contemplating litigation against the press-recipients." *Id.*, Ex.K ¶¶ 10, 16-17, 28, 30.

Plaintiff argues without citation to authority: Ms. Maxwell herself did not testify she intended to sue; she hasn't offered any witnesses to testify she intended to bring a lawsuit; she didn't in fact sue; and—this one is a *non-sequitur*—the statement was an "attempt[] to continue to conceal her criminal acts." Resp. 41-42. These arguments fail. The privilege exists without regard to whether *Ms. Maxwell* testifies she "intended" to sue, whether she has "witnesses" to say she intended to sue, or whether she "in fact" sued. It refers to "anticipated" litigation, not "guaranteed" litigation. Indeed, the point of the pre-litigation privilege is to promote communications that *avoid* litigation. *See Khalil*, 28 N.E.3d at 19 ("When litigation is

[16]*See Chambers v. Wells Fargo Bank, N.A.*, No. CV 15-6976 (JBS/JS), 2016 WL 3533998, at *8 (D.N.J. June 28, 2016); *see generally Hawkins v. Harris*, 661 A.2d 284, 289-91 (N.J. 1995).

anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation."). It applies when there is a good faith basis to *anticipate* litigation. Mr. Barden, Ms. Maxwell's lawyer who *drafted and caused the statement to be sent out*, actually was anticipating litigation. Doc.542-7, Ex.K ¶ 28. The argument that the statement was an attempt to "conceal" Ms. Maxwell's "criminal acts" is fatuous. It would be hard to *post facto* "conceal" alleged criminal acts that plaintiff luridly and salaciously described in an earlier public filing, i.e., in the CVRA case, in which the United States government was the defendant.

Citing no record evidence, plaintiff argues, "The record evidence shows [Mr. Barden] did not make the [January 2015] statement." Resp. 42. That argument is easily disposed of by Mr. Barden's uncontested testimony. *See* Doc.542-7, Ex.K ¶¶ 10-13, 15-17, 20, 26-28, 30.

B. Malice is irrelevant to the pre-litigation privilege.

Citing the New York Court of Appeals' decision in *Khalil*, we pointed out that malice is not relevant to the pre-litigation privilege. Memo. of Law 34-35. To prevail on the pre-litigation privilege the defendant need only establish *<u>one element</u>*: the allegedly defamatory statement at issue was "'pertinent to a good faith anticipated litigation.'" *Id.* (quoting *Khalil*, 28 N.E.3d at 16). Plaintiff disputes this and, without discussing *Khalil* or citing authorities, simply argues the pre-litigation privilege is "foreclosed . . . because [Ms. Maxwell] acted with malice." Resp. 43. As suggested by her inability to find any law to support her, plaintiff is wrong.

Under general New York defamation law, "[t]he shield provided by a qualified privilege may be dissolved" if plaintiff in rebuttal can show that the defendant "spoke with 'malice.'" *Liberman v. Gelstein*, 605 N.E.2d 344, 349 (N.Y. 1992); *accord Khalil*, 28 N.E.3d at 19. "Malice" means two things: spite or ill will, and knowledge of falsity or reckless disregard of falsity. *Liberman*, 605 N.E.2d at 349. Plaintiff relies on this general qualified-privilege law.

The problem for plaintiff is that in *Khalil* the New York Court of Appeals held this general rule does not apply to the pre-litigation privilege. Khalil worked for a company named Front. After eight years, he resigned and began working for "EOC," one of Front's competitors. Front's lawyer Kimmel sent a demand letter to Khalil alleging he had committed criminal, tortious and ethical misconduct. Kimmel sent another demand letter to EOC and others stating Khalil had conspired with EOC to breach his fiduciary duty to Front. Six months later, Front sued Khalil. Khalil brought a third-party claim against Kimmel for libel *per se*. The trial court dismissed the lawsuit, ruling that the letters were "absolutely privileged" under the litigation privilege "and that it therefore did not need to reach the question of malice." 28 N.E.3d at 17 (internal quotations omitted). The Appellate Division affirmed, holding that the litigation privilege absolutely protected the letter "because they were issued in the context of prospective litigation." *Id.* at 18 (internal quotations omitted).

The Court of Appeals affirmed, but altered the law on the litigation privilege. It observed, "Although it is well-settled that statements made *in the course of litigation* are entitled to absolute privilege, this Court has not directly addressed whether statements made by an attorney on behalf of his or her client in connection with *prospective litigation* are privileged." *Id.* (emphasis supplied). Some Appellate Division departments had held the absolute privilege applies to statements made in connection with prospective litigation, but other departments had held such statements were entitled only to a qualified privilege. *Id.*

The answer to whether pre-litigation statements should be absolute or qualified, the Court of Appeals held, is driven by the rationale for protecting pre-litigation statements:

> When litigation is anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation. Attorneys often send cease and desist letters to avoid litigation. . . . Communication during this pre-litigation phase should be encouraged and not chilled by the possibility of being the basis for a defamation suit.

Id. at 19. However, the court recognized that "extending privileged status to communication made prior to anticipated litigation has the potential to be abused"; extending an absolute privilege to this context, the court said, "would be problematic and unnecessary." *Id.*

The court held it would recognize only a qualified privilege for pre-litigation communications. *Id.* Crucially to the case at bar, the court held that the traditional privilege-rebuttal malice was *inapplicable* to the pre-litigation privilege:

> *Rather than applying the general malice standard to this pre-litigation stage*, the privilege should only be applied to statements pertinent to a good faith anticipated litigation. This requirement ensures that privilege does not protect attorneys who are seeking to bully, harass, or intimidate their client's adversaries by threatening baseless litigation or by asserting wholly unmeritorious claims, unsupported in law and fact, in violation of counsel's ethical obligations. Therefore, we hold that statements made prior to the commencement of an anticipated litigation are privileged, and that *the privilege is lost where a defendant proves that the statements were not pertinent to a good faith anticipated litigation*.

Id. (emphasis supplied).

Accordingly, the only question is whether the January 2015 statement Mr. Barden caused to be issued to the six to thirty journalists was "pertinent to a good faith anticipated litigation." The undisputed evidence establishes that the answer is yes. Mr. Barden anticipated litigation.[17] He "fully complied with [his] ethical obligation as a lawyer."[18] He was hardly "bully[ing], harass[ing], or intimidat[ing]" the six to thirty journalists, since he caused a press agent, Mr.

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[17]*See* Doc.542-7, Ex.K ¶ 28 ("At the time I directed the issuance of the statement, I was contemplating litigation against the press-recipients . . . ."); *id.* ¶ 17 (statement was intended as "'a shot across the bow'"; "the statement was very much intended as a cease and desist letter to the media-recipients, letting [them] understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct"); Doc.542-6, Ex.F ("Maxwell . . . reserves her right to seek redress").

[18]Doc.542-7, Ex.K ¶ 26.

Gow, to issue the statement,[19] and he believed he had an affirmative duty in representing Ms. Maxwell to prepare the statement and cause it to be delivered to the journalists.[20]

Plaintiff argues that when Mr. Barden issued the January 2015 statement on Ms. Maxwell's behalf, he had only "'wholly unmeritorious claims, *unsupported in law and fact,* in violation of counsel's ethical obligations'" and did not have "'good faith anticipated litigation.'" Resp. 46 (quoting *Khalil*, 28 N.E.3d at 19; italics omitted). Plaintiff's rationale? Because she was telling the truth and so the media would only be reporting the truth. *Id.* That is a nonsensical, frivolous argument.

Whether Mr. Barden, who represents Ms. Maxwell, had a meritorious or good faith basis for anticipating defamation litigation has nothing to do with whether the media believed plaintiff was telling the truth, and surely not whether *the plaintiff* believed or said she was telling the truth. Based on his knowledge of plaintiff's history, Mr. Barden in good faith believed that plaintiff had been making false allegations for years and that the falsity of the allegations "should have been obvious to the media." Doc.542-7, Ex.K ¶ 13; *see id.* ¶¶ 14, 16-17, 20-23, 26-28, 30. Accordingly, at the time he caused the statement to issue, Mr. Barden had a good-faith basis to anticipate litigation against any of the media that republished plaintiff's false allegations.

It hardly matters for purposes of the pre-litigation privilege whether the media republished or did not republish plaintiff's allegations or whether Mr. Barden ultimately did or did not sue any of the media for any republication. As the *Khalil* court recognized, "[a]ttorneys often send cease and desist letters to avoid litigation," 28 N.E.3d at 19, and such letters have a

[19]The *Khalil* court admonished attorneys to "exercise caution when corresponding with unrepresented potential parties who may be particularly susceptible to harassment and unequipped to respond properly even to appropriate communications from an attorney." *Khalil*, 28 N.E.3d at 19 n.2.

[20]*See* Doc.542-7, Ex.K ¶ 26.

valid purpose protected by the pre-litigation privilege. Mr. Barden testified that the January 2015 statement in fact served as a cease and desist letter. *See* Doc.542-7, Ex.K ¶ 17.

IV. Ms. Maxwell's January 4, 2015, statement is nonactionable.

Plaintiff did not respond to our argument that Ms. Maxwell's January 4, 2015, statement to a reporter is nonactionable. *See* Memo. of Law 38-39. We respectfully submit plaintiff has confessed this point. *See Cowan*, 95 F. Supp. 3d at 645-46.

V. Summary judgment is warranted because plaintiff cannot establish falsity or actual malice by clear and convincing evidence.

Plaintiff is a public figure. *See* Memo. of Law 16-17, 49-54. Therefore, she must prove falsity and actual malice. Under New York law, a public-figure defamation plaintiff must go beyond the federal constitutional minimum and prove falsity by clear and convincing evidence. *Blair v. Inside Ed. Prods.*, 7 F. Supp. 3d 348, 358 & n.6 (S.D.N.Y. 2014) (citing *DiBella v. Hopkins*, 403 F.3d 102, 111 (2d Cir.2005)). She must also prove actual malice by clear and convincing evidence. *Karedes v. Ackerley Grp., Inc.*, 423 F.3d 107, 114 (2d Cir. 2005) (quoting *Phila. Newspapers v. Hepps*, 475 U.S. 767, 773 (1986)).

Clear and convincing evidence is evidence that "produces in the mind of the trier of fact a firm belief or conviction as to the truth of the allegations sought to be established, evidence so clear, direct and weighty and convincing as to enable the factfinder to come to a clear conviction, without hesitancy, of the truth of the precise facts in issue." *Blair*, 7 F. Supp. 3d. at 358 (internal quotations and brackets omitted).

Plaintiff must prove by clear and convincing evidence (a) the material falsity of three sentences in the context of the January 2015 statement, and (b) Ms. Maxwell's actual malice, i.e., knowledge of the falsity of the three sentences or reckless disregard of whether they were false. The three sentences are: in the first paragraph of the statement, plaintiff's allegations are

"untrue"; in the same paragraph, the "original allegations" have been "shown to be untrue"; and in the third paragraph, plaintiff's "claims are obvious lies."[21] Doc.1 ¶ 30.

Plaintiff cannot prove the falsity of the three sentences, let alone actual malice. If the Rule 56 record establishes that *two* of plaintiff's CVRA joinder-motion allegations are false and *two* of her "original" allegations are false, this defamation action collapses on itself. This is because the statement does not specify how many of plaintiff's allegations are false; it certainly does not say "all" plaintiff's allegations are false. It uses the plural of "allegation." The plural of allegation literally means "more than one." *See* Memo. of Law 21.

Sentence No. 1. Since the sentence does not specify any particular allegation and since plaintiff made a plethora of allegations against Ms. Maxwell, plaintiff would be required to prove the truth of every one of the plethora of allegations *and* that Ms. Maxwell knew each one of the allegations was true. Conversely, if there are at least two allegations that plaintiff cannot prove to be true or if there was good reason for Ms. Maxwell to believe at least two of the allegations to be false, then summary judgment should enter against plaintiff.

There are at least two allegations by plaintiff against Ms. Maxwell that are untrue. In the CVRA joinder motion, plaintiff alleged that in plaintiff's first encounter with Mr. Epstein, Ms. Maxwell took her to Mr. Epstein's bedroom for a massage that Mr. Epstein and Ms. Maxwell "turned . . . into a sexual encounter," Doc.542-4, Ex.D, at 3. This allegation contradicted her allegation in the Sharon Churcher article that a woman *other than* Ms. Maxwell

[21] Ms. Maxwell said in her deposition she "know[s]" plaintiff is a "liar." This testimony, plaintiff argues, "contradict[s]" our contention that the three sentences in the January 2015 statement are opinion. Resp. 39-40. Plaintiff's argument is a *non-sequitur*. Ms. Maxwell's 2016 deposition testimony in which she disclosed all the reasons she believes plaintiff has uttered a plethora of false allegations is wholly irrelevant to whether the three sentences in the January 2015 statement, prepared by Mr. Barden to respond to the joint-motion allegations, are opinions.

took her to Mr. Epstein's bedroom; during the massage *that* woman gave instructions to plaintiff, and the massage "quickly developed into a sexual encounter." Doc.542-1, Ex.A, at 4.

A second allegation pertaining to plaintiff's entire story about Ms. Maxwell's introduction of plaintiff to Prince Andrew is untrue. In the joinder motion, plaintiff alleged Ms. Maxwell served an "important . . . role" in "Epstein's sexual abuse ring," namely, connecting Mr. Epstein to "powerful individuals" who would sexually abuse plaintiff. *Id.*, Ex.D, at 5. Plaintiff alleged that in this role Ms. Maxwell introduced plaintiff to Prince Andrew, and she was "forced to have sexual relations with this Prince in three separate geographical locations," including Ms. Maxwell's London apartment. *Id.*, Ex.D, at 5. These allegations directly contradicted her earlier allegations in the 2011 Churcher article that (a) there never was "any sexual contact between [plaintiff] and [Prince] Andrew," and (b) Prince Andrew did not know "Epstein paid her to have sex with [Epstein's] friends." *Id.*, Ex.A, at 6.

Mr. Barden on behalf of Ms. Maxwell said in the first sentence that plaintiff's "allegations"—plural—against Ms. Maxwell are "untrue." We have just established through plaintiff's own contradictory words that it would be fair to characterize at least two of her allegations to be untrue. Having spent significant time with Ms. Churcher in 2011 and having substantial incentive to disclose all important details of her "sex abuse" story, *see* Menninger Decl. EXHIBIT OO, plaintiff in 2011 presented a story that exculpated Ms. Maxwell and Prince Andrew of the very misconduct that in 2015—after securing a lawyer and seeing her story as a profit vehicle—she inculpated them for. In the face of her contradictory allegations, plaintiff cannot possibly prove by clear and convincing evidence that all her joinder-motion allegations are true, or that when Ms. Maxwell said they were untrue, she knew each one of the allegations was true or that she recklessly disregarded whether each one was true.

Under New York law, a defendant's allegedly defamatory statement is held "to a standard of substantial, not literal, accuracy." *Law Firm of Daniel P. Foster*, 844 F.2d at 959. Here, Ms. Maxwell's first sentence *literally* is true: more than one of plaintiff's allegations are "untrue." Accordingly, there is no defamation.

Sentence No. 2. The second sentence at issue in this action states, "The original allegations are not new and have been fully responded to and shown to be untrue." Plaintiff alleges the sentence is defamatory to the extent it asserts the original allegations were "shown to be untrue." Doc.1 ¶ 30. Plaintiff cannot prove this statement's falsity.

It is a matter of pure opinion whether any given allegation was "shown" to be untrue. Some people require more proof than others to conclude that a fact has been "shown to be untrue." We discussed above various examples of this, e.g., climate change. Here, Ms. Maxwell via Mr. Barden in March 2011 issued a statement denying plaintiff's Churcher-story allegations as "all entirely false." Doc.542-3, Ex.C. Plaintiff did not respond to this statement, let alone claim it was defamatory. Her non-response reasonably could be seen as a concession that Ms. Maxwell's denial was righteous. *See* Doc.542-7, Ex.K (Mr. Barden: "I would have been remiss if I had sat back and not issued a denial, and the press had published that Ms. Maxwell had not responded to enquiries and had not denied the new allegations; the public might have taken the silence as an admission there was some truth in the in allegations.").

Regardless, we easily can show two of plaintiff's original allegations are untrue. Many of plaintiff's original allegations are contained in the two Churcher articles, Docs.542-1 & 542-2, Exs.A & B. The articles contained numerous allegations by plaintiff relating to her alleged sexual abuse. In her deposition, plaintiff was shown Deposition Exhibit 7, a collection of some of her allegations in the articles. Plaintiff placed checkmarks by those allegations she admitted—over the course of 20 pages of testimony—were not true. *See* Menninger Decl. EXHIBIT PP, at

435:7-455:6 & Depo. Ex.7. These include her claims that: (1) she was 17 when she flew to the Caribbean with Mr. Epstein and Ms. Maxwell "went to pick up Bill in a huge black helicopter," referring to former President Bill Clinton; (2) her conversation with Mr. Clinton about Ms. Maxwell's pilot skills; and (3) Donald Trump was a "good friend" of Mr. Epstein's and "flirted with me".

Plaintiff's admissions on the falsity of her original allegations are fatal to her defamation claim as to the second sentence. The eleven admittedly false "original allegations" axiomatically would warrant the second sentence. Plaintiff has no possible way to prove the second sentence is false. Indeed, like Ms. Maxwell's first sentence, the second sentence literally is true: more than one of plaintiff's original allegations are untrue. A statement that literally is true cannot be defamatory as a matter of law. *See Law Firm of Daniel P. Foster,* 844 F.2d at 959.

Sentence No. 3. Defamation as to the third sentence is foreclosed. To begin with, as discussed above, whether plaintiff has uttered "obvious lies" is a matter of opinion: in the face of plaintiff's gratuitous and lurid allegations of Ms. Maxwell's years-long participation at the center of a child sex-trafficking ring, for the journalists-recipients of the July 2015 statement the phrase was an anticipated "epithet[], fiery rhetoric or hyperbole," *Steinhilber,* 501 N.E.2d at 556 (internal quotations omitted); *see Tel. Sys. Int'l*, 2003 WL 22232908, at *2 (observing Court's previous holding in *Rizzuto* that defendants' use of phrases "conned," "rip off" and "lying" in advertisements were not actionable as libel and were "rhetorical hyperbole, a vigorous epithet used by those who considered themselves unfairly treated and sought to bring what they alleged were the true facts to the readers") (internal quotations omitted).

Even if *arguendo* the third sentence—plaintiff's "claims are obvious lies"—cannot be considered opinion, the Rule 56 record forecloses a defamation claim. The sentence does not specify which of plaintiff's "claims," i.e., allegations, are obvious lies. It could refer to the

"original" claims; the "new," CVRA claims; the claims against Ms. Maxwell; the claims against anyone, including Professor Dershowitz, who was mentioned in the preceding sentence; or any two or more of all the claims plaintiff ever had made about her alleged experiences as the alleged victim of a child sex-trafficking ring.

Regardless of what is being referred to, there is no defamation. As demonstrated in the discussion above of the first and second sentences, the Rule 56 record establishes that at least two of plaintiff's "original" allegations are untrue, at least two of her CVRA allegations are untrue, at least two of her allegations against Ms. Maxwell are untrue, at least two of her allegations against anyone (e.g., Ms. Maxwell, Prince Andrew or Professor Dershowitz) are untrue, and at least two of her allegations about her alleged sex-trafficking experiences are untrue. Moreover, the untruthfulness—the falsity—of the allegations certainly is "obvious." After all, plaintiff herself admitted under oath that a multitude of her original allegations are untrue, and she implicitly admitted some of her CVRA allegations are untrue because they were contradicted by her original allegations.

CONCLUSION

The Court should grant summary judgment in favor of Ms. Maxwell.

February 10, 2017.

Respectfully submitted,

s/ Laura A. Menninger

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United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff, Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.
________________________________/

PLAINTIFFS' RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT

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I. PRELIMINARY STATEMENT

There can be no question that disputed issues of material facts preclude granting summary judgment when, in a one-count defamation case, Defendant presents the Court with a 68-page memorandum of law, a 16-page statement of purported facts, and approximately 700 pages of exhibits. The sheer scope of Defendant's response, if anything, conclusively demonstrates that volumes of disputed facts surround the core question of whether Defendant abused Ms. Giuffre. Indeed, Defendant acknowledges a dispute between the parties as to whether she abused Ms. Giuffre. *See, e.g.*, Motion for Summary Judgment at 1; Motion to Dismiss at 1. This Court already said that this disputed factual question is central to this case:

> Either Plaintiff is telling the truth about her story and Defendant's involvement, or defendant is telling the truth and she was not involved in the trafficking and ultimate abuse of Plaintiff. The answer depends on facts. Defendant's statements are therefore actionable as defamation. Whether they ultimately prove to meet the standards of defamation (including but not limited to falsity) *is a matter for the fact-finder.*

Order Denying Defendant's Motion to Dismiss at 10. While this fact remains in dispute, summary judgment is foreclosed.

But even turning to Defendant's claims, the avalanche of aspersions she casts upon Ms. Giuffre and her counsel should not distract the Court from the fact that the instant motion cannot come within sight of meeting the standard for an award of summary judgment. The most glaring and emblematic example of the Defendant's far-fetched claims appears in her attempt to move away from her defamatory statement by arguing that it was her attorney and not her, who issued the defamatory statement for the press to publish, though she is forced to admit the statement was made on her behalf. This is an untenable position to take at trial, and an impossible argument to advance at the summary judgment stage, as both the testamentary and documentary evidence positively refute that argument. Defendant incorrectly asks this Court to make a factual

finding that her defamatory press release was actually a legal opinion, issued not by her, but by her lawyer, to the media, despite documentary evidence showing otherwise.

Defendant also argues that she has proven the truth of her statement calling Ms. Giuffre a liar with respect to the statements Ms. Giuffre made about Defendant. To the contrary, voluminous evidence, both documentary and testimonial from numerous witnesses, corroborate Ms. Giuffre's account of Defendant's involvement in the sexual abuse and trafficking of Ms. Giuffre. Just to briefly highlight a few, Johanna Sjoberg, testified that Defendant recruited her under the guise of a legitimate assistant position, but asked her to perform sexual massages for Epstein, and punished her when she didn't cause Epstein to orgasm.[1] Tony Figueroa testified that Defendant contacted him to recruit high school-aged girls for Epstein, and also testified that Maxwell and Epstein participated in multiple threesomes with Virginia Giuffre. Even more shockingly, the butler for Defendant's close friend witnessed, first-hand, a fifteen-year-old Swedish girl crying and shaking because Defendant was attempting to force her to have sex with Epstein and she refused. This is a fraction of the testimony that will be elicited at trial about Defendant's involvement in the sexual abuse and trafficking of Ms. Giuffre.

Defendant's primary argument in support of her contention that she did not abuse and traffic Ms. Giuffre as a minor child is that employment records show that Ms. Giuffre was either sixteen or seventeen when Defendant recruited her from her job at Mar-a-Lago for sex with Epstein, not fifteen-years-old as Plaintiff originally thought. Call this the "yes-I'm-a-sex-trafficker-but-only-of-sixteen-year-old-girls" defense. Defendant does not explain why sexual abuse of a fifteen year old differs in any material way from sexual abuse of a sixteen or seventeen year old. All instances involve a minor child, who cannot consent, and who is

[1] *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 8:5-10; 13:1-3; 12:17-14:3; 15:1-5; 32:9-16; 34:5-35:1; 36:2-1.

protected by federal and state laws. The fact remains that Defendant recruited Ms. Giuffre while she was a minor child for sexual purposes and then proceeded to take her all over the world on convicted pedophile Jeffrey Epstein's private jet, the "Lolita Express,"[2] as well as to his various residences, and even to her own London house. Flight logs even reveal twenty-three flights that Defendant shared with Ms. Giuffre – although Defendant claims she is unable to remember even a single one of those flights. Inconsequential details that Ms. Giuffre may have originally remembered incorrectly do not render her substantive claims of abuse by Defendant false, much less deliberate "lies." At most, these minor inaccuracies, in the context of a child suffering from a troubled childhood and sexual abuse, create nothing more than a fact question on whether Defendant's statement that Ms. Giuffre lied when she accused Defendant of abuse is "substantially true," thereby precluding summary judgment. *See Mitre Sports Int'l Ltd. v. Home Box Office, Inc.*, 22 F. Supp. 3d 240, 255 (S.D.N.Y. 2014) ("Because determining whether COI is substantially true would require this court to decide disputed facts ... summary judgment is not appropriate").

Defendant has tried to spin these inconsequential mistakes of memory into talismanic significance and evidence of some form of bad-faith litigation, but this claim fails under the weight of the evidence. As the Court knows, the clear weight of the evidence establishes Defendant's heavy and extensive involvement in both Jeffrey Epstein's sex trafficking ring and in recruiting Ms. Giuffre, living with her and Jeffrey Epstein in the same homes while Ms. Giuffre was a minor, and traveling with Ms. Giuffre and Jeffrey Epstein – including 23 documented flights. Even the house staff testified that Defendant and Ms. Giuffre were regularly

[2] *See, e.g.*: "All aboard the 'Lolita Express': Flight logs reveal the many trips Bill Clinton and Alan Dershowitz took on pedophile Jeffrey Epstein's private jet with anonymous women" at The Daily Mail, http://www.dailymail.co.uk/news/article-2922773/Newly-released-flight-logs-reveal-time-trips-Bill-Clinton-Harvard-law-professor-Alan-Dershowitz-took-pedophile-Jeffrey-Epstein-s-Lolita-Express-private-jet-anonymous-women.html.

together. *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 103:4-9 ("Q. After that day, do you recall that she started coming to the house more frequently. A. Yes, she did. Q. In fact, did she start coming to the house approximately three times a week? A. Yes, probably."). It is also undisputed that witnesses deposed in this case have testified about Defendant's role as a procurer of underage girls and young women for Jeffrey Epstein. At the very least, a trier of fact should determine whether the evidence establishes whether or not Ms. Giuffre's claims of Defendant being involved in her trafficking and abuse are true. Defendant's summary judgment motion should be denied in its entirety.

II. UNDISPUTED FACTS

The record evidence in this case shows that Defendant shared a household with convicted pedophile Jeffrey Epstein for many years. While there, she actively took part in recruiting underage girls and young women for sex with Epstein, as well as scheduling the girls to come over, and maintaining a list of the girls and their phone numbers. Ms. Giuffre was indisputably a minor when Defendant recruited her to have sex with convicted pedophile Jeffrey Epstein. Thereafter, Ms. Giuffre flew on Epstein's private jets – the – Lolita Express" – with Defendant at least 23 times.

A. It is an Undisputed Fact That Multiple Witnesses Deposed in This Case Have Testified That Defendant Operated as Convicted Pedophile Jeffrey Epstein's Procurer of Underage Girls.

1. <u>It is an undisputed fact that Joanna Sjoberg testified Defendant lured her from her school to have sex with Epstein under the guise of hiring her for a job answering phones</u>.

Ms. Sjoberg's account of her experiences with Defendant are chillingly similar. As with Ms. Giuffre, Defendant, a perfect stranger, approached Ms. Sjoberg while trolling Ms. Sjoberg's school grounds. She lured Ms. Sjoberg into her and Epstein's home under the guise of a legitimate job of answering phones, a pretext that lasted only a day. A young college student,

nearly 2,000 miles from home, Defendant soon instructed Ms. Sjoberg to massage Epstein, and made it clear that Sjoberg's purpose was to bring Epstein to orgasm during these massages so that Defendant did not have to do it.

Q. And when did you first meet Ms. Maxwell?
A. 2001. March probably. End of February/beginning of March.
Q. And how did you meet her?
A. She approached me while I was on campus at Palm Beach Atlantic College.

***

Q. And how long did you work in that position answering phones and doing --
A. Just that one day.

***

Q. And what happened that second time you came to the house?
A. At that point, I met Emmy Taylor, and she took me up to Jeffrey's bathroom and he was present. And her and I both massaged Jeffrey. She was showing me how to massage. And then she -- he took -- he got off the table, she got on the table. She took off her clothes, got on the table, and then he was showing me moves that he liked. And then I took my clothes off. They asked me to get on the table so I could feel it. Then they both massaged me.

***

Q. Who did Emmy work for?
2 A. Ghislaine.
3 Q. Did Maxwell ever refer to Emmy by any particular term?
5 A. She called her her slave.

***

Q. Did Jeffrey ever tell you why he received so many massages from so many different girls?
A. He explained to me that, in his opinion, he needed to have three orgasms a day. It was biological, like eating.

***

Q. Was there anything you were supposed to do in order to get the camera?
THE WITNESS: I did not know that there were expectations of me to get the camera until after. She [Defendant] had purchased the camera for me, and I was over there giving Jeffrey a massage. I did not know that she was in possession of the camera until later. She told me -- called me after I had left and said, I have the camera for you, but you cannot receive it yet because **you came here and didn't finish your job and I had to finish it for you.**
Q. And did you -- what did you understand her to mean?
A. She was implying that I did not get Jeffrey off, and so she had to do it.
Q. And when you say "get Jeffrey off," do you mean bring him to orgasm?
A. Yes.

***

Q. Based on what you knew, did Maxwell know that the type of massages Jeffrey was getting typically involved sexual acts?
THE WITNESS: Yes.
Q. **What was Maxwell's main job with respect to Jeffrey?**

THE WITNESS: **Well, beyond companionship, her job, as it related to me, was to find other girls that would perform massages for him and herself**.[3]

Ms. Sjoberg also testified about sexual acts that occurred with her, Prince Andrew, and Ms. Giuffre, when she and Defendant were staying at Epstein's Manhattan mansion:

> Q. Tell me how it came to be that there was a picture taken.
> THE WITNESS: I just remember someone suggesting a photo, and they told us to go get on the couch. And so Andrew and Virginia sat on the couch, and they put the puppet, the puppet on her lap. And so then I sat on Andrew's lap, and I believe on my own volition, and they took the puppet's hands and put it on Virginia's breast, and so Andrew put his on mine.[4]

Ms. Sjoberg's testimony corroborates Ms. Giuffre's account of how Defendant recruited her (and others) under a ruse of a legitimate job in order to bring them into the household to have sex with Epstein. Ms. Sjoberg's testimony also corroborates Ms. Giuffre's account of being lent out to Prince Andrew by Defendant, as even the interaction Ms. Sjoberg witnessed included a sexual act: Prince Andrew using a puppet to touch Ms. Giuffre's breast while using a hand to touch Ms. Sjoberg's breast.

2. It is an undisputed fact that Tony Figueroa testified that Defendant would call him to bring over underage girls and that Defendant and Epstein would have threesomes with Ms. Giuffre.[5]

Tony Figueroa testified that Plaintiff told him about threesomes Ms. Giuffre had with Defendant and Epstein which included the use of strap-ons:

> Q. Okay. And tell me everything that you remember about what Ms. Roberts said about being intimate with Ms. Maxwell and Mr. Epstein at the same time.
> A. I remember her talking about, like, strap-ons and stuff like that. But, I mean, like I said, all the details are not really that clear. But I remember her talking about, like, how they would always be using and stuff like that.
> Q. She and Ms. Maxwell and Mr. Epstein would use strap-ons?
> A. Uh-huh (affirmative).

***

[3] *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 8:5-10; 13:1-3; 12:17-14:3; 15:1-5; 32:9-16; 34:5-35:1; 36:2-15.
[4] *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 82:23-83:9.
[5] Defendant attempts to discredit Figueroa's damaging testimony by repeatedly mentioning that he has been convicted for a drug-related offense. Unsurprisingly, in this attack, Defendant does not mention that she has a DUI conviction. *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 390:13-15. (April 22, 2016).

> Q. Other than sex with the Prince, is there anyone else that Jeffrey wanted Ms. Roberts to have sex with that she relayed to you?
> A. Mainly, like I said, just Ms. Maxwell and all the other girls.
> Q. Ms. Maxwell wanted -- Jeffrey wanted Virginia to have sex with Ms. Maxwell?
> A. And him, yeah.
> Q. And did she tell you whether she had ever done that?
> A. Yeah. She said that she did.
>
> ***
>
> Q. And what did she describe having happened?
> A. I believe I already told you that. With the strap-ons and dildos and everything.[6]

[redacted]

[redacted].[7]

Figueroa also testified that Defendant called him to ask if he had found any other girls for Epstein, thereby acting as procurer of girls for Epstein:

> Q. [W]hen Ghislaine Maxwell would call you during the time that you were living with Virginia, she would ask you what, specifically?
> A. Just if I had found any other girls just to bring to Jeffrey.
> Q. Okay.
> A. Pretty much every time there was a conversation with any of them, it was either asking Virginia where she was at, or asking her to get girls, or asking me to get girls.
>
> ***
>
> Q. Okay. Well, tell me. When did Ms. Maxwell ask you to bring a girl?
> A. Never in person. It was, like, literally, like, on the phone maybe, like, once or twice.
> Q All right. Did Ms. Maxwell call you frequently?
> A. No.
> Q. All right. How many times do you think Ms. Maxwell called you, at all?
> A. I'd just say that probably a just a few, a couple of times. Maybe once or twice.
> Q. One or two --
> A. The majority of the time it was pretty much his assistant.
> Q. How do you know Ms. Maxwell's voice?
> A. Because she sounds British.
> Q. So someone with a British accent called you once or twice and asked for --
> A. Well, she told me who she was.
> Q. Okay. And what did she say when she called you and asked you to bring girls?
> A. She just said, "Hi. This is Ghislaine. Jeffrey was wondering if you had anybody that could come over."[8]

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[6] *See* McCawley Dec. at Exhibit 4, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103.
[7] *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 55:19-58:23 (July 22, 2016).
[8] *See* McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 200:6-18; 228:23-229:21.

3. **It is an undisputed fact that Rinaldo Rizzo testified that Defendant took the passport of a 15-year-old Swedish girl and threatened her when she refused to have sex with Epstein.**

Rinaldo Rizzo was the house manager for one of Defendant's close friends, Eva Dubin. Mr. Rizzo testified - through tears – how, while working at Dubin's house, he observed Defendant bring a 15 year old Swedish girl to Dubin's house. In distress, the 15 year old girl tearfully explained to him that Defendant tried to force her to have sex with Epstein through threats and stealing her passport:

> Q. How old was this girl?
> A. 15 years old.
>
> ***
>
> Q. Describe for me what the girl looked like, including her demeanor and anything else you remember about her when she walks into the kitchen.
> A. Very attractive, beautiful young girl. Makeup, very put together, casual dress. But she seemed to be upset, maybe distraught, and she was shaking, and as she sat down, she sat down and sat in the stool exactly the way the girls that I mentioned to you sat at Jeffrey's house, with no expression and with their head down. But we could tell that she was very nervous.
> Q. What do you mean by distraught and shaking, what do you mean by that?
> A. Shaking, I mean literally quivering.
>
> ***
>
> Q. What did she say?
> A. She proceeds to tell my wife and I that, and this is not -- this is blurting out, not a conversation like I'm having a casual conversation. That quickly, I was on an island, I was on the island and there was Ghislaine, there was Sarah, she said they asked me for sex, I said no. And she is just rambling, and I'm like what, and she said -- I asked her, I said what? And she says yes, I was on the island, I don't know how I got from the island to here. Last afternoon or in the afternoon I was on the island and now I'm here. And I said do you have a -- this is not making any sense to me, and I said this is nuts, do you have a passport, do you have a phone? And she says no, and she says Ghislaine took my passport. And I said what, and she says Sarah took her passport and her phone and gave it to Ghislaine Maxwell, and at that point she said that she was threatened. And I said threatened, she says yes, I was threatened by Ghislaine not to discuss this. And I'm just shocked. So the conversation, and she is just rambling on and on, again, like I said, how she got here, she doesn't know how she got here. Again, I asked her, did you contact your parents and she says no. At that point, she says I'm not supposed to talk about this. I said, but I said: How did you get here. I don't understand. We were totally lost for words. And she said that before she got there, she was threatened again by Jeffrey and Ghislaine not to talk about what I had mentioned earlier, about -- again, the word she used was sex.
> Q. And during this time that you're saying she is rambling, is her demeanor continues to be what you described it?

A. Yes.
Q. Was she in fear?
A. Yes.
Q. You could tell?
A. Yes.
A. She was shaking uncontrollably.[9]

4. It is an undisputed fact that Lyn Miller testified that she believed Defendant became Ms. Giuffre's "new mama".

Lyn Miller is Ms. Giuffre's mother. She testified that when Ms. Giuffre started living with Defendant, Defendant became Ms. Giuffre's "new momma."[10] Incredulously, Defendant testified that she barely remembered Ms. Giuffre.[11]

5. It is an undisputed Fact that Detective Joseph Recarey testified that he sought to investigate Defendant in relation to his investigation of Jeffrey Epstein.

Detective Recarey led the Palm Beach Police's investigation of Epstein. He testified that Defendant procured girls for Epstein, and that he sought to question her in relation to his investigation, but could not contact her due to the interference of Epstein's lawyer:

Q. A cross-reference of Jeffrey Epstein's residence revealed which affiliated names?
A. It revealed Nadia Marcinkova, Ghislane Maxwell, Mark Epstein. Also, the cross-reference, any previous reports from the residence as well.
Q. During your investigation, did you learn of any involvement that Nadia Marcinkova had with any of the activities you were investigating?

***

Q. The other name that is on here as a cross-reference is Ghislane Maxwell. Did you speak with Ghislane Maxwell?
A. I did not.
Q. Did you ever attempt to speak with Ghislane Maxwell?
A. I wanted to speak with everyone related to this home, including Ms. Maxwell. My contact was through Gus, Attorney Gus Fronstin, at the time, who initially had told me that he would make everyone available for an interview. And subsequent conversations later, no one was available for interview and everybody had an attorney, and I was not going to be able to speak with them.
Q. Okay. During your investigation, what did you learn in terms of Ghislane Maxwell's involvement, if any?

[9] *See* McCawley Dec. at Exhibit 14, Rinaldo Rizzo's June 10, 2016 Dep. Tr. at 52:6-7; 52:25-53:17; 55:23-58:5
[10] *See* McCawley Dec. at Exhibit 12, Lynn Miller's May 24, 2016 Dep. Tr. at 115.
[11] *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 77:25-78:15 (April 22, 2016).

THE WITNESS: Ms. Maxwell, during her research, was found to be Epstein's long-time friend. During the interviews, Ms. Maxwell was involved in seeking girls to perform massages and work at Epstein's home.[12]

6. It is an undisputed fact that Pilot David Rodgers testified that he flew Defendant and Ms. Giuffre at least 23 times on Epstein's jet, the "Lolita Express" and that "GM" on the flight logs Stands for Ghislaine Maxwell.

Notably, at Defendant's deposition, Defendant refused to admit that she flew with Ms. Giuffre, and denied that she appeared on Epstein's pilot's flight logs.[13] However, David Rodgers, Epstein pilot, testified that the passenger listed on his flight logs bearing the initials – GM – was, in fact, Ghislaine Maxwell, and that he was the pilot on at least 23 flights in which Defendant flew with Plaintiff.[14] The dates of those flights show that Ms. Giuffre was an underage child on many of them when she flew with Defendant.[15]

7. It is an undisputed fact that Sarah Kellen, Nadia Marcinkova, and Jeffrey Epstein invoked the Fifth Amendment when asked about Defendant trafficking girls for Jeffery Epstein.

Both Sarah Kellen and Nadia Marcinkova lived with Jeffrey Epstein for many years. They both invoked the Fifth Amendment when asked about Defendant's participation in recruiting underage girls for sex with Epstein. Marcinkova testified as follows:

Q. Did Ghislaine Maxwell work as a recruiter of young girls for Jeffrey Epstein when you met her?
A. Same answer. [Invocation of Fifth Amendment]

***

Q. Have you observed Ghislaine Maxwell and Jeffrey Epstein convert what started as a massage with these young girls into something sexual?
A. Same answer.[16]

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[12] *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 27:10-17; 28:21-29:20.
[13] *See* McCawley Dec. at Exhibit 11, Maxwell's April 22, 2016 Dep. Tr. at 78-79, 144.
[14] *See* McCawley Decl. at Exhibit 41, Rodgers Dep. Ex. 1, GIUFFRE 007055-007161 (flight records evidencing Defendant (GM) flying with Ms. Giuffre).
[15] *See* McCawley Dec. at Exhibit 15, David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36; *see also* Exhibit 41, Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589.
[16] *See* McCawley Dec. at Exhibit 10, Marcinkova Dep. Tr. at 10:18-21; 12:11-15.

Kellen testified as follows:

> Q. Did Ghislaine Maxwell work as a recruiter for young girls for Jeffrey Epstein when you met her?
> A. On advice of my counsel I must invoke my Fifth and Sixth Amendment privilege . . .
>
> ***
>
> Q. Isn't it true that Ghislaine Maxwell would recruit underage girls for sex and sex acts with Jeffrey Epstein?
> A. On advice of my counsel I must invoke my Fifth and Sixth Amendment privilege . . .[17]

Similarly, Jeffrey Epstein invoked the Fifth Amendment when asked about Defendant's involvement in procuring underage girls for sex with him.

> Q. Maxwell was one of the main women whom you used to procure underage girls for sexual activities, true?
> THE WITNESS: Fifth.
>
> ***
>
> Q. Maxwell was a primary co-conspirator in your sexual abuse scheme, true?
> THE WITNESS: Fifth.
> Q. Maxwell was a primary co-conspirator in your sex trafficking scheme, true?
> THE WITNESS: Fifth.
> Q. Maxwell herself regularly participated in your sexual exploitation of minors, true?
> THE WITNESS: Fifth.[18]

8. It is an undisputed fact that Juan Alessi testified that Defendant was one of the people who procured some of the over 100 girls he witnessed visit Epstein, and that he had to clean Defendant's sex toys.

Juan Alessi was Epstein's house manager. He testified as follows:

> Q. And over the course of that 10-year period of time while Ms. Maxwell was at the house, do you have an approximation as to the number of different females – females that you were told were massage therapists that came to house?
> A. I cannot give you a number, but I would say probably over 100 in my stay there.
>
> ***
>
> Q. I don't think I asked the right – the question that I was looking to ask, so let me go back. Did you go out looking for the girls –
> A. No.
> Q. – to bring –
> A. Never
> Q. – as the massage therapists?
> A. Never.
> Q. Who did?

[17] *See* McCawley Dec. at Exhibit 8, Kellen Dep. Tr. at 15:13-18; 20:12-16.
[18] *See* McCawley Dec. at Exhibit 3, Epstein Dep. Tr. at 116:10-15; 117:18-118:10.

A. Ms. Maxwell, Mr. Epstein and their friends, because their friend relay to other friends they knew a massage therapist and they would send to the house. So it was referrals.

***

Q. Did you have occasion to clean up after the massages?
A. Yes.
Q. Okay. And that is after both a massage for Jeffrey Epstein, as well as clean up after a massage that Ghislaine Maxwell may have received?
A. Yes.
Q. And on occasion, after -- in cleaning up after a massage of Jeffrey Epstein or Ghislaine Maxwell, did you have occasion to find vibrators or sex toys that would be left out?
A. yes, I did.[19]

9. It is an undisputed fact that Defendant was unable to garner a single witness throughout discovery who can testify that she did not act as the procurer of underage girls and young women for Jeffrey Epstein.

Defendant has not been able to procure a single witness - not one – to testify that Defendant did not procure girls for sex with Epstein or participate in the sex. Even one of her own witnesses, Tony Figueroa, testified that she both procured girls and participated in the sex. Another one of Defendant's witnesses, Ms. Giuffre's mother, named Defendant as Ms. Giuffre's "new mamma." Indeed, those who knew her well, who spent considerable time with her in Epstein's shared household, like Juan Alessi, Alfredo Rodriguez and Joanna Sjoberg, have testified that she was Epstein's procuress. Others who lived with her – Jeffrey Epstein, Nadia Marcinkova, and Sarah Kellen – invoked the Fifth Amendment so as not to answer questions on the same. No one has testified to the contrary.

B. Documentary Evidence also Shows that Defendant Trafficked Ms. Giuffre and Procured her for Sex with Convicted Pedophile Jeffrey Epstein while She Was Underage.

1. <u>The Flight Logs</u>

Defendant has never offered a legal explanation for what she was doing with, and why she was traveling with, a minor child on 21 flights while she was a child, including 6 international flights, aboard a convicted pedophile's private jet all over the world. Her motion for

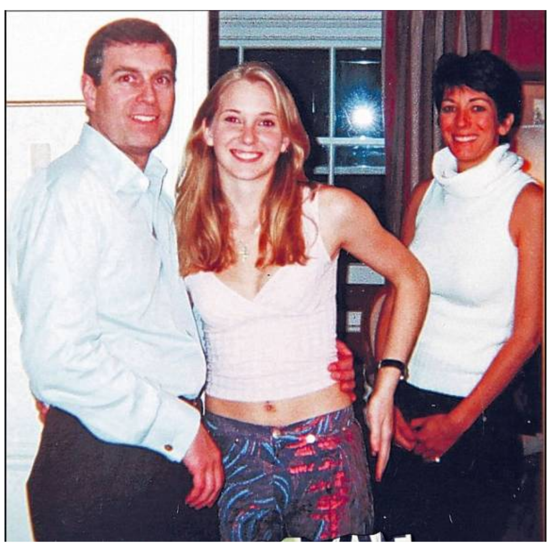
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[19] *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 28:6-15; 30:51-25; 52:9-22.

summary judgment – as well as all previous briefing papers – are absolutely silent on those damning documents.

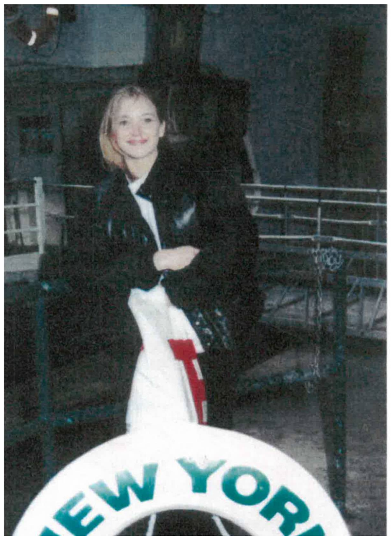
2. The Photographs

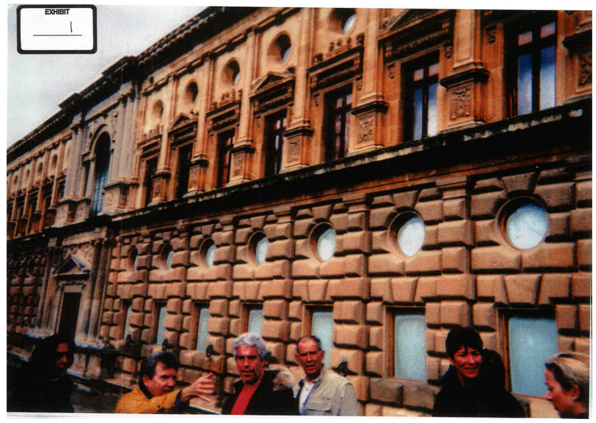
Throughout a mountain of briefing and, and even in her own deposition testimony, Defendant never offered an explanation regarding Ms. Giuffre's photographs of her, Defendant, and Epstein. She never offered a legal explanation for why Prince Andrew was photographed with his hand around Ms. Giuffre's bare waist while she was a minor child, while posing with Defendant, inside Defendant's house in London. This particular photograph corroborates Ms. Giuffre's claims, and there is no other reasonable explanation why an American child should be in the company of adults not her kin, in the London house owned by the girlfriend of a now-convicted sex offender.[20]



Ms. Giuffre also produced pictures of herself taken when she was in New York with Defendant and Epstein, and from a trip to Europe with Defendant and Epstein:[21]

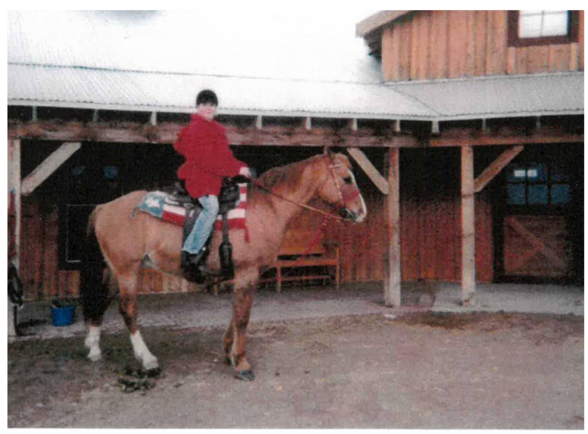
[20] *See* McCawley Dec at Exhibit 42, GIUFFRE007167, Prince Andrew and Defendant Photo.
[21] *See* McCawley Dec at Exhibit 42, GIUFFRE007182 - 007166.





And, Ms. Giuffre has produced a number of pictures of herself taken at the Zorro Ranch, Epstein's New Mexico Ranch, two of which are below.[22]





Finally, among other nude photos, which included full nudes of Defendant, Ms. Giuffre produced images of females that the Palm Beach Police confiscated during the execution of the

[22] *See* McCawley Dec at Exhibit 42, GIUFFRE007175; 007173.

warrant, including one photograph revealing the bare bottom of a girl who appears to be pre-pubescent (Ms. Giuffre will only submit its redacted form):[23]



3. <u>The Victim Identification Letter</u>

In 2008, the United States Attorney's office for the Southern District of Florida identified Ms. Giuffre as a protected "victim" of Jeffrey Epstein's sex abuse. The U.S. Attorney mailed Ms. Giuffre a notice of her rights as a crime victim under the CVRA.[24]

Re: <u>Jeffrey Epstein/ ____________ NOTIFICATION OF IDENTIFIED VICTIM</u>

Dear :

By virtue of this letter, the United States Attorney's Office for the Southern District of Florida provides you with the following notice because you are an identified victim of a federal offense.

4. <u>New York Presbyterian Hospital Records</u>

Ms. Giuffre has provided extensive medical records in this case, including medical records from the time when Defendant was sexually abusing and trafficking her. Ms. Giuffre produced records supporting her claim of being sexually abused in New York resulting in both

[23] *See* McCawley Dec at Exhibit 44, GIUFFRE007584.
[24] *See* McCawley Dec. at Exhibit 30, GIUFFRE 002216-002218, Victim Notification Letter.

Defendant and Epstein taking Plaintiff to New York Presbyterian Hospital in New York while she was a minor.[25] The dates on the hospital records show she was seventeen years old.

5. Judith Lightfoot Psychological Records

As the Court is aware, Defendant propounded wildly overbroad requests for production concerning the past eighteen years of Ms. Giuffre's medical history. Defendant repeatedly and vehemently argued to the Court that it was essential to procure every page of these records in a fanfare of unnecessary motion practice. *See, e.g.*, Defendant's Motion to Compel (DE 75); Defendant's Motion for Sanctions at 10 ("Ms. Maxwell has been severely prejudiced by Plaintiff's failure to provide the required identifying information and documents from her health care providers."). Ms. Giuffre and her counsel took on the considerable burden and significant expense of retrieving and producing over 250 pages of medical records from over 20 providers, spanning two continents and nearly two decades.

Now that those records have been collected, Defendant's 68 page motion makes no reference to a single medical record produced by Ms. Giuffre, nor a single provider, nor a single treatment, nor or a single medication prescribed. After Defendant's repeated motion practice stressing the essentiality of these records, this may surprise the Court. But not Ms. Giuffre. Defendant's requests unearthed documents that are highly unfavorable to Defendant that corroborate Ms. Giuffre's claims against her.

Years before this cause of action arose, Ms. Giuffre sought counseling from a psychologist for the trauma she continued to experience after being abused by Defendant and Epstein. A 2011 psychological treatment record, written by her treating psychologist, unambiguously describes Defendant as Ms. Giuffre's abuser:

[25] *See* McCawley Dec at Exhibit 33, GIUFFRE003259-003290.

> . . . [Ms. Giuffre] was approached by Ghislaine Maxwell who said she could help her get a job as a massage therapist . . . seemed respectable . . . was shown how to massage, etc., Geoff [sic] Epstein. Told to undress and perform sexual acts on person. Miss Maxwell promised her $200 a job.[26]

Therefore, years before Defendant defamed her, Ms. Giuffre confided in her treating psychologist that Maxwell recruited her for sex with Epstein.

6. <u>Message Pads</u>

Detective Recarey, the lead investigator of the criminal investigation into Epstein and his associates' sex crimes, recovered carbon copies of hand-written messages taken by various staff, including Defendant, at Epstein's Palm Beach residence.[27] These were collected both from trash pulls from the residence and during the execution of the search warrant where the pads were found laying out in the open in the residence.[28] The search warrant was executed in 2005 and the message pads collected include messages recorded in 2004 and 2005. Numerous witnesses have described that these copies of collected messages accurately reflect those taken by various staff at the Palm Beach Epstein mansion between 2004 and 2005.[29]

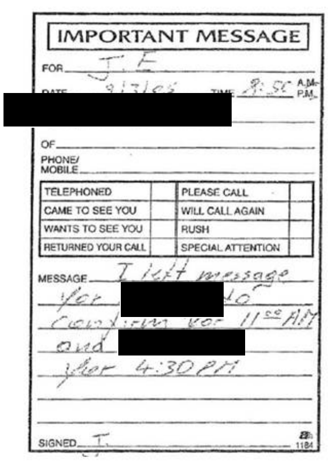
The messages raise a question of fact as to Maxwell's involvement in the sexual abuse of minors and are relevant to refute Maxwell's denial of any involvement with Epstein during relevant time periods, and, accordingly her denial of knowledge of certain events.

While there were hundreds of these messages recovered during the investigation, this small sample demonstrates the undeniable reality that there exists a genuine issue of material fact with respect to Defendant's involvement in and knowledge of the activities described by Giuffre which Maxwell has said we "untrue" and "obvious lies."

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[26] *See* McCawley Dec. at Exhibit 38, Lightfoot Records, GIUFFRE005437.
[27] *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 45:13-25; 97:9-98:8.
[28] *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 25:12-21; 40:5-15; 41:16-23; 42:14-43:10; 45:13-25; *see also* search warrant video showing the pads openly displayed on the desk.
[29] *See* McCawley Dec. at Exhibit 21, 1, 16, 11, Rodriguez Dep. Tr. at 73:19-74:12; Alessi Dep. Tr. at 141:18-21; Sjoberg Dep. Tr. at 64:1-6; Maxwell Dep. Tr. at 147:23-148:3; 148:19-149:14.

This sampling reveals that Maxwell, "GM," took messages at the residence, including from underage girls who were calling to schedule a time to come over to see Epstein. This demonstrates that Maxwell was at Epstein's Palm Beach mansion in 2004 and 2005, incidentally a time period she has denied being around the house in her deposition. *See supra* GIUFFRE001412; 001435; 001449. The messages also reveal that multiple "girls" were leaving messages that were being taken and memorialized and left out in the open for anyone to see. Certain messages also make clear that a number of these "girls" were in school. In addition to taking messages herself (and the staff working under her direction taking these relevant messages), staff employees were taking and leaving messages for Defendant. This is evidence that Maxwell was in the house at relevant times, including times that she has now testified under oath that she was not there. Other messages demonstrate Epstein and Maxwell's friends, including Jean Luc Brunel, leaving messages relating to underage females. The following is a small sampling of such messages:



IMPORTANT MESSAGE

FOR J. E

DATE TIME 8:50 A.M. P.M.

OF

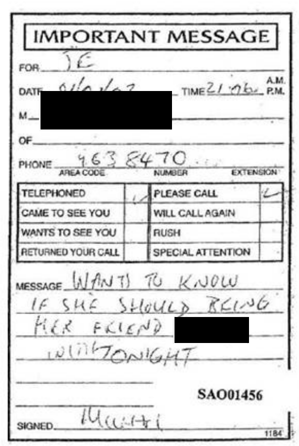
PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I left message for to confirm for 11[00] AM and for 4:30 PM

SIGNED T.

GIUFFRE001412 (SAO01092)



IMPORTANT MESSAGE

FOR JE

DATE TIME 21:06 A.M. P.M.

M

OF

PHONE 463 8470
AREA CODE NUMBER EXTENSION

TELEPHONED	✓	PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE WANTS TO KNOW IF SHE SHOULD BRING HER FRIEND WITH TONIGHT

SAO01456

SIGNED

GIUFFRE001427 (SAO01456)



IMPORTANT MESSAGE

FOR Jeff. w/

DATE 2/28/05 TIME 12:30 A.M. P.M.

M

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She is wondering if 2:30 is ok cuz she needs to stay in school

GIUFFRE001388 (SAO01067)



IMPORTANT MESSAGE
FOR MR EPSTEIN
DATE 7/9/04 TIME 7:50 A.M. P.M.
M
OF
PHONE/MOBILE
TELEPHONED | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE " [redacted] IS AVAILABLE ON TUESDAY NO ONE FOR TOMORROW
SAO01461
SIGNED R

GIUFFRE001432 (SAO01461)



IMPORTANT MESSAGE
FOR J. E.
DATE 8/20/05 TIME 8:50 A.M.
M
OF
PHONE/MOBILE
TELEPHONED X | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE [redacted] confirmed at 4 PM
Who is scheduled for morning?
I believe [redacted] wants to work.
SIGNED J

GIUFFRE001448 (SAO01476)



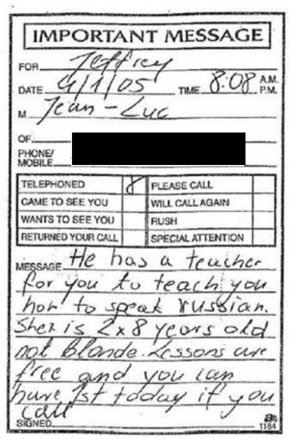
IMPORTANT MESSAGE
FOR Jeffrey
DATE TIME 5:11 A.M. P.M.
M [redacted]
OF
PHONE/MOBILE [redacted]
TELEPHONED X | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE has girl for tonight
SIGNED

GIUFFRE001452 (SAO02828)



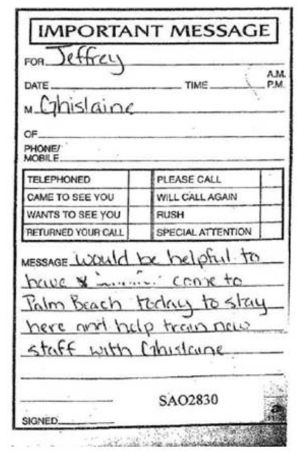
IMPORTANT MESSAGE
FOR JE
DATE TIME 5:14 A.M. P.M.
M JeanLuc
OF
PHONE/MOBILE
TELEPHONED | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE He just did a good one - 18 years - (She spoke to me & said "I love Jeffrey")
SIGNED

GIUFFRE001456 (SAO2832)



IMPORTANT MESSAGE
FOR Jeffrey
DATE 4/1/05 TIME 8:08 A.M. P.M.
M Jean-Luc
OF
PHONE/MOBILE [redacted]
TELEPHONED X | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE He has a teacher for you to teach you how to speak russian. Sher is 2x8 years old not blonde. Lessons are free and you can have 1st today if you call
SIGNED

GIUFFRE001563 (SAO3008)



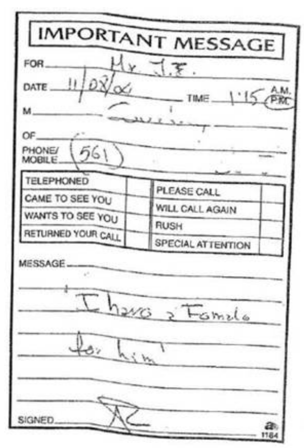
IMPORTANT MESSAGE
FOR Jeffrey
DATE TIME A.M. P.M.
M Ghislaine
OF
PHONE/MOBILE
TELEPHONED | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE would be helpful to have [illegible] come to Palm Beach today to stay here and help train new staff with Ghislaine
SAO2830
SIGNED

GIUFFRE001454 (SAO02830)



IMPORTANT MESSAGE
FOR J.E
DATE 1/30/05 TIME 6:10 A.M. P.M.
M
OF
PHONE/MOBILE (561) [redacted]
TELEPHONED | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE 'I have 2 female for him'
SAO01455
SIGNED

GIUFFRE001426 (SAO01455)



IMPORTANT MESSAGE
FOR Mr J.E.
DATE 11/08/04 TIME 1:15 A.M. P.M.
M
OF
PHONE/MOBILE (561)
TELEPHONED | PLEASE CALL
CAME TO SEE YOU | WILL CALL AGAIN
WANTS TO SEE YOU | RUSH
RETURNED YOUR CALL | SPECIAL ATTENTION
MESSAGE I have 2 Female for him'
SIGNED

GIUFFRE001423 (SAO01452)

The following are descriptions of a sampling of messages pads[30] that create a genuine dispute of material fact:

- One message pad reflects [REDACTED], who is identified in the Palm Beach Police Report as a minor, contacting Jeffrey Epstein for "work" explaining that she does not have any money. The term "work" was often used by members of Jeffrey Epstein's sexual trafficking ring to refer to sexual massages. (*See* GIUFFRE05660 ("She stated she was called by Sara for her to return to work for Epstein. [REDACTED] stated 'work' is the term used by Sarah to provide the massage in underwear."). **Giuffre 001462: July 5th no year to JE from [REDACTED] "I need work. I mean I don't have money. Do you have some work for me?"**

- Other message pads reflect [REDACTED] who was a minor, calling and leaving a message at the Palm Beach mansion that she has recruited another girl for Jeffrey Epstein. The second message demonstrates that Jeffrey Epstein required different girls to be scheduled every day of the week. The third shows an offer to have two minor girls come to the home at the same time to provide sexual massages. These type of messages indicate the lack of secrecy of the fact that multiple young females were visiting every day and at least raises a question of fact whether Maxwell was knowledgeable and involved as Giuffre has said, or whether Giuffre was lying and Maxwell was not at all involved or aware of this activity, as Defendant would attempt to have the world believe. **Giuffre 001428 – undated Jeffrey From [REDACTED] – "Has girl for tonight" ;Giuffre 001432 (pictured above)– 7/9/04 – Mr. Epstein From [REDACTED] – "[REDACTED] is available on Tuesday no one for tomorrow"; GIUFFRE 001433 /1/17/04 – Mr. Epstein from [REDACTED] – "Me and _____ can come tomorrow any time or [REDACTED] alone" ; Giuffre – 001452 – undated Jeffrey from [REDACTED] "Has girl for tonight."**

- Other message pads demonstrate that there was a pattern and practice of using young females to recruit additional young females to provide sexual massages on a daily basis. **Giuffre 001413 (pictured above)– JE from "N" – "[REDACTED] hasn't confirmed [REDACTED] for 11:00 yet, so she is keeping [REDACTED] on hold in case [REDACTED] doesn't call back; Giuffre 001448 -8/20/05 JE from [REDACTED] - [REDACTED] confirmed ___ at 4 pm. Who is scheduled for morning? I believe [REDACTED] wants to work."**

  This message pad reflects that a friend of Jeffrey Epstein is sending him a sixteen year old Russian girl for purposes of sex. **Giuffre 001563 (pictured above)- 6/1/05 For Jeffrey From Jean Luc "He has a teacher for you to teach you how to speak Russian. She is 2X8 years old not blonde. Lessons are free and you can have your 1st today if you call."**

- This message pad directly refutes Maxwell's sworn testimony that she was not present during the year 2005 at Jeffrey Epstein's Palm Beach mansion because this shows [REDACTED] leaving a message for Jeffrey at the Palm Beach home that she was going to work out

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[30] *See* McCawley Dec. at Exhibit 28.

with the Defendant on September 10, 2005. The police were only able to retrieve a fraction of these message pads during their trash pull but even in the few they recovered, it shows Maxwell was regularly at the Palm Beach home during the time period she claimed she was not. To the contrary, she was both sending and receiving messages and messages, like this one, reflect her presence at the mansion. **Giuffre 001412 – 9/10/05 (during the year Maxwell says she was never around) JE from [REDACTED] – "I went to Sarah and made her water bottle and I went to work out with GM."**

- These message pads further corroborate that Defendant lied in her testimony and she was in fact in regular contact with Jeffrey Epstein during the years 2004 and 2005. For example, the message from "Larry" demonstrates that Defendant is at the Palm Beach mansion so frequently that people, including Epstein's main pilot Larry Visoski, are leaving messages for Maxwell at the Palm Beach house. **Giuffre 001435 7/25/04 – Mr. Epstein from Ms. Maxwell – "tell him to call me"; Giuffre – 001449 – 8/22/05 – JE from GM; Giuffre – 001453 – 4/25/04 for Ms. Maxwell From Larry "returning your call";**

- This message pad shows that Defendant was clearly actively involved in Jeffrey Epstein's life and the activities at his Palm Beach mansion. **Giuffre – 001454 – undated Jeffrey From Ghislaine – "Would be helpful to have ___________ come to Palm Beach today to stay here and help train new staff with Ghislaine."**

- This message pad clearly reflects an underage female (noted by the police redaction of the name) leaving a message asking if she can come to the house at a later time because she needs to "stay in school." **Giuffre 001417 (pictured above)– Jeffrey 2/28/05 Redacted name "She is wondering if 2:30 is o.k. She needs to stay in school."**

- This message pad reflects a message from [REDACTED] who was under the age of eighteen at the time she was going over to Jeffrey Epstein's home to provide sexual massages according to the Palm Beach Investigative Report. **Giuffre 001421 3/4/05 to Jeffrey from [REDACTED] "It is o.k. for [REDACTED] to stop by and drop something?"**

- These message pads reflect the pattern of underage girls (noted by the police redaction of the name on the message pad) calling the Palm Beach mansion to leave a message about sending a "female" over to provide a sexual massage. **Giuffre 001423 11/08/04 To Mr. JE – redacted from – "I have a female for him" Giuffre 001426 (pictured above) – 1/09/05 JE To JE from Redacted – "I have a female for him."**

- This message pad reflects the pattern and practice of having young girls bring other young girls to the house to perform sexual massages. Indeed the "[REDACTED]" reflected in this message pad corresponds in name to the "[REDACTED]" that Tony Figueroa testified he initially brought to Jeffrey Epstein during the time period that the Defendant was requesting that Tony find some young females to bring to Jeffrey Epstein's home. *See* Figueroa at 184-185. The Palm Beach Police Report reflects that "[REDACTED]" and "[REDACTED]" also brought seventeen year old [REDACTED] to the home to perform sexual massages. *See* GIUFFRE 05641. [REDACTED] thereafter recruited a number of other young girls to perform sexual

massages as reflected in the Palm Beach Police Report. **Giuffre 001427 (pictured above) – 1/2/03 – JE from [redacted] "Wants to know if she should bring her friend [redacted] with tonight."**

- This message pad reflects multiple sexual massages being scheduled for the same day which corroborates Virginia GIUFFRE, [redacted] and Johanna Sjorberg's testimony that Jeffrey Epstein required that he have multiple orgasms in a day which occurred during these sexual massages. **Giuffre 001449 (pictured above) – 9/03/05 JE from [redacted] – "I left message for [redacted] to confirm for 11:00 a.m. and [redacted] for 4:30 p.m."**

- This message pad shows a friend of Jeffrey Epstein's discussing with him how he had sex with an 18 year old who had also been with Jeffrey Epstein. **Giuffre – 001456 (pictured above)– undated JE from Jean Luc – "He just did a good one – 18 years – she spoke to me and said "I love Jeffrey."**

Law enforcement was able to confirm identities of underage victims through the use of the names and telephone numbers in these message pads:

> Q. The next line down is what I wanted to focus on, April 5th, 2005. This trash pull, what evidence is yielded from this particular trash pull?
> THE WITNESS: The trash pull indicated that there were several messages with written items on it. There was a message from HR indicating that there would be an 11:00 appointment. There were other individuals that had called during that day.
> Q. And when you would -- when you would see females' names and telephone numbers, would you take those telephone numbers and match it to -- to a person?
> THE WITNESS: We would do our best to identify who that person was.
> Q. And is that one way in which you discovered the identities of some of the other what soon came to be known as victims?
> THE WITNESS: Correct.
>
> ***
>
> Q. Did you find names of other witnesses and people that you knew to have been associated with the house in those message pads?
> THE WITNESS: Yes.
> Q. And so what was the evidentiary value to you of the message pads collected from Jeffrey Epstein's home in the search warrant?
> THE WITNESS: It was very important to corroborate what the victims had already told me as to calling in and for work.[31]

7. The Black Book

Palm Beach Police confiscated an extensive lists of contacts with their phone numbers form Defendant and Epstein's residence.[32] Ghislaine Maxwell maintained a contact list in an

[31] *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 42:14-43:17; 78:25:-79:15.

approximately 100-page-long hard copy, which was openly available to other house employees. It consisted primarily of telephone numbers, addresses, or email addresses for various personal friends, associates, employees, or personal or business connections of Epstein or Defendant. Prior to being terminated by Defendant, the Palm Beach house butler Alfredo Rodriguez printed a copy of this document and ultimately provided it to the FBI. This document reflects the numerous phone numbers of Defendant, Epstein as well as staff phone numbers. Additionally, and importantly, there are several sections entitled "Massage" alongside a geographical designation with names of females and corresponding telephone numbers. These numbers included those of underage females (with no training in massage therapy) – including [REDACTED] [REDACTED] – identified during the criminal investigation of Epstein. This document is an authentic reflection of the people who were associated with Epstein, Defendant, and the management of their properties, and the knowledge each had of the contents of the document.

8. Sex Slave Amazon.com Book Receipt

Detective Recarey authenticated an Amazon.com receipt that the Palm Beach Police collected from Jeffrey Epstein's trash. The books he ordered are titled:

(1) SM 101: A Realistic Introduction, Wiseman, Jay;

(2) SlaveCraft: Roadmaps for Erotic Servitude – Principles, Skills and Tools by Guy Baldwin; and

(3) Training with Miss Abernathy: A Workbook for Erotic Slaves and Their Owners, by Christina Abernathy, as shown below:

[32] *See* McCawley Dec. at Exhibit 45, Phone List, Public Records Request No.: 16-268 at 2282 – 2288.



amazon.com.

amazon.com. Amazon.com
1850 Mercer Rd.
Lexington, KY 40511

Jeffrey Epstein
358 El Brillo Way
Palm Beach, Florida 33480
USA

Billing Address:
Jeffrey Epstein
358 El Brillo Way
Palm Beach, Florida 33480
USA

Shipping Address:
Jeffrey Epstein
358 El Brillo Way
Palm Beach, Florida 33480
USA

rbrd57708/-3-/next/2436223 SORTExtFastTrack

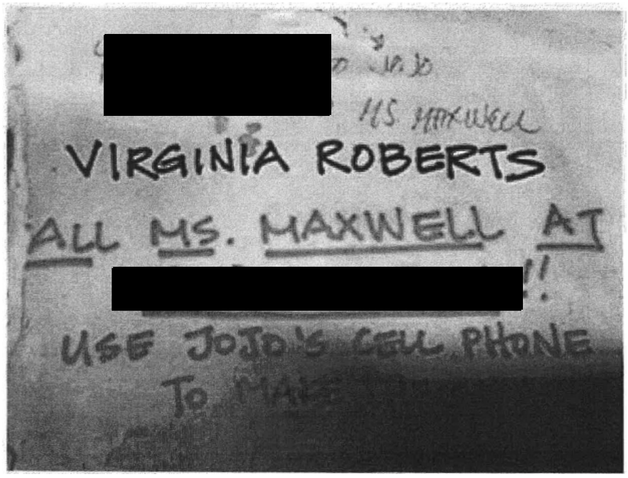
Your order of September 4, 2005 (Order ID 103-1737820-4508648)

Qty.	Item	Item Price	Total
	IN THIS SHIPMENT		
1	SM 101: A Realistic Introduction Wiseman, Jay --- Paperback (** C-2 **) 0963976389	$16.47	$16.47
1	SlaveCraft: Roadmaps for Erotic Servitude--Principles, Skills and Tools Baldwin, Guy --- Paperback (** C-2 **) 1881943143	$15.95	$15.95
1	Training With Miss Abernathy: A Workbook for Erotic Slaves and Their Owners Abernathy, Christina --- Paperback (** C-2 **) 1890159077	$11.95	$11.95

This disturbing 2005 purchase corroborate Ms. Giuffre's account of being sexually exploited by Defendant and Epstein – not to mention the dozens of underage girls in the Palm Beach Police Report. Additionally, Defendant testified that she was not with Jeffrey Epstein in 2005 and 2006 when he was ordering books on how to use sex slaves; however, record evidence contradicts that testimony.

9. <u>Thailand Folder with Defendant's Phone Number</u>

Defendant also was integral in arranging to have Virginia go to Thailand. While Epstein had paid for a massage therapy session in Thailand, there was a catch. Defendant told Virginia she had to meet young girls in Thailand and bring her back to the U.S. for Epstein and Defendant. Indeed, on the travel records and tickets Defendant gave to Virginia, Defendant wrote on the back the name of the girl Virginia was supposed to meet, and she was also instructed to check in frequently with Defendant as it was further signified by the words "Call Ms. Maxwell (917) [redacted]!" on Virginia's travel documents. In this case, Virginia also produced the hard copy records from her hotel stay in Thailand paid for by Epstein. *See* McCawley Dec. at Exhibit 32, 43, GIUFFRE 003191-003192; GIUFFRE 007411-007432.



10. <u>It is undisputed fact that the FBI report and the Churcher emails reference Ms. Giuffre's accounts of sexual activity with Prince Andrew that she made in 2011, contrary to Defendant's argument that Ms. Giuffre never made such claims until 2014</u>.

Based on the FBI's Interview of Ms. Giuffre in 2011, they wrote a report reflecting Ms. Giuffre's claims concerning her sexual encounters with Prince Andrew:[33]

> GIUFFRE and [redacted] went shopping and purchased makeup, clothing, and a Burberry bag. The items were purchased with [redacted] GIUFFRE and [redacted] returned [redacted] instructed GIUFFRE to get ready. When GIUFFRE came down after getting ready, she was introduced to [redacted]
>
> [redacted] GIUFFRE traveled to CLUB TRAMP [redacted] GIUFFRE danced [redacted] at CLUB TRAMP [redacted]
>
> [redacted] stayed at CLUB TRAMP for an hour or hour and a half and drank a couple of cocktails before returning to [redacted] GIUFFRE had not received any direction from [redacted]
>
> [redacted] After returning to [redacted] GIUFFRE requested [redacted] to take a photograph of her [redacted] GIUFFRE advised that she still had the original photograph in her possession and would provide it to the interviewing agents. GIUFFRE proceeded with [redacted]
>
> Approximately two months later, GIUFFRE met [redacted] at [redacted]
>
> [redacted] GIUFFRE recalled [redacted] LNU, [redacted]
>
> [redacted] GIUFFRE recalled [redacted] joking about trading GIUFFRE in because she was getting too old.

[33] *See* McCawley Dec. at Exhibit 31, GIUFFRE001235-1246, FBI Redacted 302.

Additionally, 2011 correspondence with Sharon Churcher shows that Ms. Giuffre disclosed her sexual encounters with Prince Andrew, but Churcher had to check with the publisher's lawyers "on how much can be published,"

> -----Original Message-----
> From: Sharon.Churcher@mailonsunday.co.uk
> Sent: Friday, 18 February 2011 7:25 AM
> To: Virginia Giuffre
>
> Hi there
> Have been up all night writing. Won't have an opinion from our lawyer on how much can be published until London wakes up. The lawyers wanted internal FBI documents but I think the Justice Dept letter is all you have from the feds??? Anyway can I give you a call early afternoon? Maybe have a late lunch?
> S

See McCawley Dec. at Exhibit 34, GIUFFRE003678. Accordingly, there is documentary evidence that refutes Defendant's meritless argument that Ms. Giuffre did not allege she had sex with Prince Andrew until 2014. To the contrary, two sources, including the FBI, show Ms. Giuffre made these claims in 2011.

C. Defendant Has Produced No Documents Whatsoever That Tend to Show That She Did Not Procure Underage Girls For Jeffrey Epstein.

Defendant has produced no documents that even tend to show that she did not procure underage girls for sex with Epstein, and no documents that tend to show that she did not participate in the abuse. Indeed, Defendant refused to produce ***any*** documents dated prior to 2009, which includes the 2000-2002 period during which she abused Ms. Giuffre.

Against this backdrop of an avalanche of evidence showing the Defendant sexually trafficked Ms. Giuffre, summary judgment on any of the issues advanced by Defendant is inappropriate. While we discuss the particulars of the individual claims below, the larger picture is important too. Ms. Giuffre will prove at trial that Epstein and Defendant sexually trafficked her. And yet, when Ms. Giuffre had the courage to come forward and expose what Defendant had done to world – in a Court pleading trying to hold Epstein accountable – Defendant

responded by calling her a liar in a press release intended for worldwide publication. Such heinous conduct is not a mere "opinion," but rather is defamation executed deliberately and with actual malice. The jury should hear all of the evidence and then render its verdict on Ms. Giuffre's complaint.

III. LEGAL STANDARD

Rule 56 of the Federal Rules of Civil Procedure provides that a motion for summary judgment may be granted only when "there is no genuine issue as to any material fact and that the moving party is entitled to a judgment as a matter of law." The Second Circuit has repeatedly held that "all ambiguities and inferences to be drawn from the underlying facts should be resolved in favor of the party opposing the motion, and all doubts as to the existence of a genuine issue for trial should be resolved against the moving party." *Swan Brewery Co. Ltd. v. U.S. Trust Co. of New York*, 832 F. Supp. 714, 717 (S.D.N.Y. 1993) (Sweet, J.), citing *Brady v. Town of Colchester*, 863 F.2d 205, 210 (2d Cir. 1988) (internal quotations omitted). In other words, in deciding a motion for summary judgment, the court must construe the evidence in the light most favorable to the non-moving party and draw all reasonable inferences in the non-moving party's favor. *In re "Agent Orange" Prod. Liab. Litig.*, 517 F.3d 76, 87 (2d Cir. 2008). *Stern v. Cosby*, 645 F. Supp. 2d 258, 269 (S.D.N.Y.2009). Summary judgment should be denied "if the evidence is such that a reasonable jury could return a verdict" in favor of the non-moving party. *See Net Jets Aviation, Inc. v. LHC Commc'ns, LLC*, 537 F.3d 168, 178–79 (2d Cir. 2008).

IV. LEGAL ARGUMENT

A. Defendant is Liable for the Publication of the Defamatory Statement and Damages for Its Publication

Defendant's lead argument is that, when she issued a press release attacking Ms. Giuffre to members of the media, she somehow is not responsible when the media quickly published her

attacks. If accepted, this remarkable claim would eviscerate defamation law, as it would permit a defamer to send defamatory statements to the media and then stand back and watch – immune from liability – when (as in this case) the defamatory statements are published around the world. This absurd position is not the law, particularly given that the Defendant released a statement to media asking them to "[p]lease find attached a ***quotable statement*** on behalf of Ms. Maxwell."

To make her claim seem plausible, Defendant cites older cases, some dating back as far as 1906. This presents a distorted picture of the case law on these issues. As a leading authority on defamation explains with regard to liability for republication by another of statement by a defendant: "Two standards have evolved. The older one is that the person making the defamatory statement is liable for republication only if it occurs with his or her express or implied authorization of consent. The more modern formulation adds responsibility for all republication that can reasonably be anticipated or that is the 'natural and probable consequence' of the publication." SACK ON DEFAMATION § 2.7.2 at 2-113 to 2-114 (4th ed. 2016). In this case, however, the nuances of the applicable legal standards make little difference because Defendant so clearly authorized – indeed, desired and did everything possible to obtain – publication of her defamatory statements attacking Ms. Giuffre.

1. <u>Under New York Law, Defendant is liable for the media's publication of her press release</u>.

Given the obvious purposes of defamation law, New York law unsurprisingly assigns liability to individuals for the media's publication of press releases. Indeed, New York appellate courts have repeatedly held that an individual is liable for the media publishing that individual's defamatory press release. *See Levy v. Smith*, 18 N.Y.S.3d 438, 439, 132 A.D.3sd 961, 962–63 (N.Y.A.D. 2 Dept. 2015) ("Generally, [o]ne who makes a defamatory statement is not responsible for its recommunication without his authority or request by another over whom he

has no control . . . Here, however . . . the appellant intended and authorized the republication of the allegedly defamatory content of the press releases in the news articles"); *National Puerto Rican Day Parade, Inc. v. Casa Publications, Inc.*, 914 N.Y.S.2d 120, 123, 79 A.D.3d 592, 595 (N.Y.A.D. 1 Dept. 2010) (affirming the refusal to dismiss defamation counts against a defendant who "submitted an open letter that was published in [a] newspaper, and that [the defendant] paid to have the open letter published," and finding that the defendant "authorized [the newspaper] to recommunicate his statements.") *See also* RESTATEMENT (SECOND) OF TORTS § 576 (1977) ("The publication of a libel or slander is a legal cause of any special harm resulting from its repetition by a third person if . . . the repetition was authorized or intended by the original defamer, or . . . the repetition was reasonably to be expected.")[34]

Defendant deliberately sent her defamatory statement to major news media publishers for worldwide circulation because Defendant wanted the public at large to believe that Ms. Giuffre was lying about her abuse. Defendant even hired a public relations media specialist to ensure the media would publish her statement. Her efforts succeeded: her public relations agent instructed dozens of media outlets to publish her "quotable" defamatory statement and they did.

Despite this deliberate campaign to widely publicize her defamatory statement, Defendant now disclaims any responsibility for the media publishing her press release. If we understand Defendant's position correctly, because she somehow lacked "control" over what major newspapers and other media finally put in their stories, she escapes liability for defamation. This nonsensical position would let a defamer send a false and defamatory letter to major media, and then, when they published the accusation, escape any liability. Such an

[34]*Cf., Eliah v. Ucatan Corp.*, 433 F. Supp. 309, 312–13 (W.D.N.Y. 1977) ("The alleged multistate publication of plaintiff's photograph without her consent thus gives rise to a single cause of action. … However, evidence of the multistate publication of the magazine and the number of copies sold would be competent and pertinent to a showing of damages, if any, suffered by plaintiff.")

argument is not only an affront to logic, but it is contrary to prevailing New York case law, cited above. Perhaps even more important, in the context of the pending summary judgment motion, it would require Defendant to convince the jury that she did not "authorize or intend" for the major media to publish her press release. Obviously the disputed facts on this point are legion, and summary judgment is accordingly inappropriate.

Even the cases Defendant cites contradict her argument. She first cites *Geraci v. Probst*, in which a defendant sent a letter to the Board of Fire Commissioners, and, years later, a newspaper published the letter. The court held that the defendant was not liable for that belated publication, "made years later without his knowledge or participation." *Id*., at 340. By contrast, Defendant not only authorized the defamatory statement, but paid money to her publicist to convince media outlets to publish it promptly – actions taken with both her knowledge and consent. Defendant's statement was thus not published "without [her] authority or request," as in *Geraci*, but by her express authority and by her express request. Defendant's publicist's testimony and the documents produced by Defendant's publicist unambiguously establish that the media published her press release with Defendant's authority and by her request:

> Q. When you sent that email were you acting pursuant to Ms. Maxwell's retention of your services?
> A. Yes, I was
>
> ***
>
> Q. The subject line does have "FW" which to me indicates it's a forward. Do you know where the rest of this email chain is?
> A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, "Okay, Ghislaine, I'll go with this."
> It is my understanding that this is the agreed statement because the subject of the second one is "Urgent, this is the statement" so ***I take that as an instruction to send it out, as a positive command***: "This is the statement."[35]

[35] *See* McCawley Dec. at Exhibit 6, Ross Gow Dep. Tr. at 14:15-17; 44:6-45:13 (emphasis added).

Similarly, another case cited by Defendant, *Davis v. Costa-Gavras*, involved a libel claim against a book author who wrote an account of the 1972 military coup in Chile. Years later, the plaintiff attempted to ascribe defamation liability to a third-party publishing house's decision to republish the book in paperback form and a third-party filmmaker who released a movie based on the book. The Court held that a "party who is 'innocent of all complicity' in the publication of a libel cannot be held accountable . . . [but that] a deliberate decision to republish or active participation in implementing the republication resurrects the liability." 580 F. Supp. 1082, 1094 (S.D.N.Y. 1984). Here, Defendant made a deliberate decision to publish her press release, and actively participated in that process. At the very least, the jury must make a determination of whether Defendant was "innocent of all complicity" for a libelous statement contained in her press release.

Finally, Defendant cites *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557 (1980), which held that reporters of a series of articles on narcotics trade "cannot be held personally liable for injuries arising from its subsequent republication in book form absent a showing that they approved or participated in some other manner in the activities of the third-party republisher." *Id.*, 416 N.E.2d at 559-560. Again, the jury could reasonably find that Defendant both approved of, and even participated in, the media's publication of her press release. Indeed, it is hard to understand how any jury could find anything else. Defendant was obviously "active" in influencing the media to publish her defamatory press release, she both "approved" of and pushed for the publication of the press release. Accordingly, she is liable for its publication.[36]

[36] On page 14 of her motion, Defendant makes wholly contradictory statements. In back-to-back sentences, she tells the Court that (1) she has no control over whether the media published the statement she sent to the media (with instructions to publish it by an influential publicist); (2) her public relations representative gave instructions to the media on how to publish it (in full); and (3) her public relations representative "made no effort to control" how the media would publish it. Indeed, the best evidence of Defendant's control over the press is the fact dozens of media outlets obeyed her directive to publish her defamatory statement.

Therefore, disclaiming responsibility for the media's publication of a statement (for which she hired a publicist for the purpose of influencing the media to publish that statement) is contrary to both prevailing case law, and the cases cited by Defendant.

2. **Defendant is liable for the media's publication of the defamatory statement.**

After arguing, contrary to New York law, that she is not liable for the media's publication of her own press release, Defendant next argues that she is not liable for the media's publications of the ***defamatory statement*** contained within her press release if the media chose to make even the tiniest of editorial changes. If we understand Defendant's argument correctly, any omission of any language from a press release is somehow a "selective, partial" publication for which she escapes liability. Mot. at 14. Once again, this claim is absurd on its face. It would mean that a defamer could send to the media a long attack on a victim with one irrelevant sentence and, when the media quite predictably cut that sentence, escape liability for the attack. Moreover, even on its face, the claim presents a jury question of what changes would be, in context, viewed as "selective" or "partial" publications – something that only a jury could determine after hearing all of the evidence.

In support of this meritless argument, Defendant cites *Rand v. New York Times Co.*, for the proposition that a defendant cannot be liable for a publisher's "editing and excerpting of her statement." 430 N.Y.S.2d 271, 274, 75 A.D.2d 417, 422 (N.Y.A.D. 1980). This argument fails for several reasons. First, there is no "republication" by the media as a matter of law. Defendant issued a defamatory statement to the press, and its publication (as Defendant intended) is not a "republication" under the law, as discussed above. Second, there was no "editing" or paraphrasing or taking the quote out of context of the core defamatory statement in the press release: that Ms. Giuffre is a liar. The "obvious lies" passage is the heart of the message

Defendant sent to the press: that Ms. Giuffre was lying about her past sexual abuse. Even in isolation, Defendant's quote stating that Ms. Giuffre's claims are "obvious lies" does not distort or misrepresent the message Defendant intended to convey to the public that Ms. Giuffre was lying about her claims. As this Court explained in denying Defendant's Motion to Dismiss, this case "involves statements that explicitly claim the sexual assault allegations are false." *Giuffre v. Maxwell*, 165 F. Supp. 3d 147, 152 (S.D.N.Y. 2016).

Furthermore, the facts at issue here make the *Rand* holding inapposite. In *Rand*, a newspaper paraphrased and "sanitized" defendant's words. No such changing, sanitizing, or paraphrasing occurred in the instant case: the media **quoted** Defendant's statement accurately. Further, the phrase at issue in Rand was that certain people "screwed" another person. The speaker/newspaper used the term "screwed" in reference to a record label's dealings with a performing artist, and not did not mean "screwed" in the literal sense, but as "rhetorical hyperbole, and as such, is not to be taken literally." *Id*. By contrast, there is no hyperbole in Defendant's defamatory statement, and it was never distorted or paraphrased by any publication known to Ms. Giuffre. A jury could reasonable conclude that Defendant's statement that Ms. Giuffre's claims of child sexual abuse are "obvious lies" is not a rhetorical device, nor hyperbole, but a literal and particular affirmation that Ms. Giuffre lied.

Accordingly, there is no support in the factual record that the media reporting that Defendant stated that Ms. Giuffre's claims of childhood sexual abuse are "obvious lies" is a distortion of Defendant's message or hyperbole. Even a cursory review of the press release would lead to that conclusion. Moreover, to the extent that there is any dispute that Defendant's statement had a different meaning outside of the context of the remainder of the press release,

such a determination of meaning and interpretation is a question of fact for the jury to decide, and is inappropriate for a determination upon summary judgment.

B. Material Issues of Fact Preclude Summary Judgment.

1. <u>The Barden Declaration presents disputed issues of fact</u>.

The primary basis of Defendant's motion for summary judgment is her attorney's self-serving, *post hoc* affidavit wherein he sets forth his alleged "intent" with regard Defendant's defamatory statement.[37] Ms. Giuffre disputes Defendant's attorney's alleged and unproven "intent" (not to mention Defendant's "intent"), not only because Defendant refuses to turn over her attorney's communications, but also because questions of intent are questions of fact to be determined by a trier of fact. Furthermore, ample record evidence contradicts the claimed "intent."

a. <u>The Barden Declaration is a deceptive back-door attempt to inject Barden's advice without providing discovery of all attorney communications.</u>

In her brief, Defendant discloses her attorney's alleged legal strategy and alleged legal advice; however, she deliberately states that her attorney "intended," instead of her attorney "advised," when discussing her attorney's legal strategy and advice, using that phrase ***at least 37 times***,[38] and using phrases such as Barden's "beliefs,"[39] "purposes,"[40] "goals,"[41] and

[37] The Barden declaration is problematic for other reasons as well. In addition to Defendant's over-length, 68-page motion and among Defendant's 654 pages of exhibits lies an eight-page attorney affidavit that proffers legal conclusions and arguments. This exhibit is yet another improper attempt to circumvent this Court's rules on page limits. *See Pacenza v. IBM Corp*., 363 F. App'x 128, 130 (2d Cir. 2010) (affirming lower court decision to strike "documents submitted . . . in support of his summary judgment motion [that] included legal conclusions and arguments" because those "extraneous arguments constituted an attempt . . . to circumvent page-limit requirements submitted to the court."); *cf. HB v. Monroe Woodbury Cent. School Dist*., 2012 WL 4477552, at *6 (S.D.N.Y. Sept. 27, 2012) ("The device of incorporating an affirmation into a brief by reference, as Plaintiffs have done here, in order to evade the twenty-five page limit, rather obviously defeats the purpose of the rule"). The court should disregard the Barden Declaration for that reason alone

[38] MSJ at 7 (three times), 8 (three), 15 (four), 16, 25 (five), 26, 33, 35 (two), 36 (three); Statement of Facts at 6 (two), 7 (five); Decl. of Philip Barden at 4 (four), 5 (three).

[39] MSJ at 25, 35; Statement of Facts at 7 (two); Decl. of Philip Barden at 3, 4 (three), 5 (two).

[40] MSJ at 8, 25, 35; Statement of Facts at 7 (three); Decl. of Philip Barden at 4 (two), 5 (three).

"contemplations" 25 other times. All the while Defendant has claimed a privilege as to her communications with Barden. Defendant attempts to convince the Court that she only granted Gow permission to publish the defamatory statement as part of "Mr. Barden's deliberated and carefully crafted" (MSJ at 16) legal strategy and advice. Yet, she still refused to turn over her communications with Barden under the auspices of attorney-client privilege.[42] Such gamesmanship should not be permitted.

If the Court were to consider the Barden Declaration (which it shouldn't), it would be ruling on a less than complete record because, based on this Declaration, it is necessary that Defendant disclose all communications with him and possibly others. Ms. Giuffre doesn't have those communications, the court doesn't have those communications; therefore, Defendant is asking for summary judgment on an incomplete record.

The Court should also not consider the Barden Declaration because it will be inadmissible as unduly prejudicial. It is a self-serving declaration by a non-deposed witness made without turning over the documents that are relevant to the declaration. *See, e.g.*, *Rubens v. Mason*, 387 F.3d 183, 185 (2d Cir. 2004) ("We find that the District Court predicated its grant of summary judgment as to liability on an affidavit from the arbitrator who presided over the underlying arbitration, the probative value of which was substantially outweighed by the danger of unfair prejudice. The affidavit, therefore should not have been admitted. We therefore vacate the grant of summary judgment to the defendants on liability and remand to the District Court.").

b. Defendant's summary judgment argument requires factual findings regarding Barden's intent, thereby precluding summary judgment.

Even were the Court to consider this Declaration and representations therein – which it should not – the declaration itself demonstrates that the Court would have to make factual

[41] MSJ at 27.
[42] *See* McCawley Dec. at Exhibit 22, Defendant's Privilege Log.

finding as to what Mr. Barden's intent really was. Finding about intent are inappropriate at the summary judgment stage, as this Court and the Second Circuit have recognized. This Court has explained, "***if it is necessary to resolve inferences regarding intent, summary judgment is not appropriate***." *Id*. (Sweet, J.) (emphasis added), citing *Patrick v. Le Fevre*, 745 F.2d 153, 159 (2d Cir. 1984); *Friedman v. Meyers*, 482 F.2d 435, 439 (2d Cir. 1973) (other citations omitted).

c. There are factual disputes regarding Barden's Declaration.

Finally, there are material disputes over the statements in the Barden Declaration because they are directly refuted by record evidence. For example, the instant motion and the Barden Declaration describe the press release merely as a document expressing "his [Mr. Bardent's] *opinion – in the form of a legal argument* –as a lawyer would be," as opposed to a press release for dissemination by the media to the public. Record evidence refutes this claim, as (1) the press release was sent to journalists, not media publishers or in-house counsel; (2) the press release instructed the journalists to publish the defamatory statement ("Please find attached a ***quotable statement*** on behalf of Ms. Maxwell"); (3) it was issued by a publicist on Defendant's behalf and not by an attorney, without any reference to attorneys or laws – indeed, Gow testified that Barden was unavailable to approve the statement; and (4) Gow testified that he issued the statement only after he understood Defendant to have "signed off" it, an understanding he formed based on Defendant's "positive command" to him: "This is the agreed statement."

> Q. When you sent that email were you acting pursuant to Ms. Maxwell's retention of your services?
> A. Yes, I was.
>
> ***
>
> Q. When you say "agreed statement" can you tell me more about what you mean? **Who agreed to the statement?**
> A. I need to give you some context, if I may, about that statement. So, this is on New Year's Day. I was in France so the email time here of 21:46, in French time was 22:46, and I was getting up early the next morning to drive my family back from the south of France to England, which is a 14-hour journey, door to door. So on the morning of th[e] 2nd of January,

bearing in mind that Ms. Maxwell, I think was in New York then, she was five hours behind, so there was quite a lot of, sort of time difference between the various countries here, I sent her an email, I believe, saying - parsing this-- forwarding this email to her saying "How do you wish to proceed?" And then I was on the telephone-- I had two telephones in the car, I received in excess of 30 phone calls from various media outlets on th[e] 2nd of January, all asking for information about how Ms. Maxwell was looking to respond to the latest court filings, which were filed on the 30th of December as I understand.

And by close-- towards close of play on the 2nd, **I received an email forwarded by Ms. Maxwell, containing a draft statement** which my understanding was the majority of which had been drafted by Mr. Barden **with a header along the lines of "This is the agreed statement."**· At close of play on th[e] 2nd. So–I was–I had gone under the Channel Tunnel and I was sitting on the other side and that email, which **my understanding was that it had been signed off by the client, effectively**, was then sent out to a number of media, including Mr. Ball and various other UK newspapers.

Q. Mr. Gow, when you say "end of play" and "close of play," are you referring to sending the email that is Exhibit 2?

A. Yes, I am

***

Q. The subject line does have "FW" which to me indicates it's a forward. Do you know where the rest of this email chain is?

A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so **this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, "Okay, Ghislaine, I'll go with this."**

It is my understanding that this is the agreed statement because the subject of the second one is "Urgent, this is the statement" so I take that as an instruction to send it out, as *__a positive command__*: "This is the statement."[43]

Accordingly, record evidence shows that the press release was intended as press release, and not as a "legal argument." Record evidence also establishes that Defendant circulated the press release to Barden and Gow, and then gave a "positive command" to Gow to publish it. Additionally, there is no indicia that the press release is a legal opinion. To the contrary, it was issued by, and specifically attributed to, a woman who has personal knowledge of whether Ms. Giuffre's claims of sexual abuse are true, and she states that Ms. Giuffre is a liar.[44] At the very least, all of these factual issues must be considered by a jury.

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[43] *See* McCawley Dec. at Exhibit 6, Ross Gow Dep. Tr. at 14:15-17; 31:19-33:7; 44:6-45:13 (emphasis added).

[44] Unsurprisingly, Defendant cites no case law to support her argument that her attorney's alleged influence in preparing the statement Defendant issued to the media somehow shields her from liability.

Another example is that Defendant states that "Gow served only as Mr. Barden's conduit to the media" (MTD at 25), and "Mr. Barden was directing the January 2-15 statement to a discrete number of media representatives." Barden wasn't directing anything – he wasn't even in the loop when Defendant decided to publish the statement - and the documents prove it. Indeed, the press release itself states that it is "on behalf of Ms. Maxwell," not Barden, and it was Defendant who gave the "positive command" to Gow to publish it. These are just a couple of examples, among many, of the purported facts asserted in Defendant's motion and Barden's Declaration that are directly refuted by facts in the record.

Finally, neither the media nor the general public could have known that the statement should be attributed to Barden. His name was nowhere in it, nor is there any reference to counsel. Defendant's argument that the "context" is the media knowing Barden's intent or involvement is unsupported by the record. The significant factual disputes about Barden, alone, prevent summary judgment.

C. Defendant's Defamatory Statement Was Not Opinion as a Matter of Law.

As this Court previously held, correctly, Defendant stating that Ms. Giuffre's claims of sexual assault are lies is not an expression of opinion:

> "First, statements that Giuffre's claims 'against [Defendant] are untrue,' have been 'shown to be untrue,' and are 'obvious lies' have a specific and readily understood factual meaning: that Giuffre is not telling the truth about her history of sexual abuse and Defendant's role, and that some verifiable investigation has occurred and come to a definitive conclusion proving that fact. Second, these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion. Third, in their full context, while Defendant's statements have the effect of generally denying Plaintiff's story, they also clearly constitute fact to the reader."

Giuffre v. Maxwell, 165 F. Supp. 3d 147, 152 (S.D.N.Y. 2016). This Court further explained:

> "Plaintiff cannot be making claims shown to be untrue that are obvious lies without being a liar. Furthermore, to suggest an individual is not telling the truth

> about her history of having been sexually assaulted as a minor constitutes more than a general denial, it alleges something deeply disturbing about the character of an individual willing to be publicly dishonest about such a reprehensible crime. Defendant's statements clearly imply that the denials are based on facts separate and contradictory to those that Plaintiff has alleged." *Id.*

Defendant argues that somehow the "context" of the entire statement "tested against the understanding of the average reader" should be the press release as a whole being read only by journalists. This is an unreasonable construct because the ultimate audience for a press release is the public. Indeed, the purpose of a press release is to reach readers. Unsurprisingly, Defendant cites no case that holds that journalists might somehow believe statements of fact are opinion while others do not.

This Court has previously covered this ground when it clearly stated:

> Sexual assault of a minor is a clear-cut issue; either transgression occurred or it did not. Either Maxwell was involved or she was not. The issue is not a matter of opinion, and there cannot be differing understandings of the same facts that justify diametrically opposed opinion as to whether Defendant was involved in Plaintiff's abuse as Plaintiff has claimed. Either Plaintiff is telling the truth about her story and Defendant's involvement, or Defendant is telling the truth and she was not involved in the trafficking and ultimate abuse of Plaintiff.

Giuffre v. Maxwell, 165 F. Supp.at 152 (S.D.N.Y. 2016). The same conclusion applies now. At the motion to dismiss stage, Defendant had not yet produced the statement she issued to the press. That statement is now in evidence, so there is no ambiguity as to what defendant released to the press.

The absurdity of Defendant characterizing his statements calling Ms. Giuffre a liar as mere "opinion" is revealed by the fact that Defendant was the one who was sexually trafficking and otherwise abusing Ms. Giuffre. No reasonable person in any context would construe that as Defendant's mere "opinion" on the subject, since Defendant knew she was abusing Ms. Giuffre. Indeed, this argument is contradicted by Defendant's own deposition testimony:

Q. Do you believe Jeffrey Epstein sexually abused minors?

A. I can only testify to what I know. **I know that Virginia is a liar and I know what she testified is a lie.** So I can only testify to what I know to be a falsehood and half those falsehoods are enormous and so **I can only categorically deny everything she has said** and that is the only thing I can talk about because I have no knowledge of anything else.

See McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. (April 17, 2016) at 174:6-19.

Defendant slyly contends in her motion that "Mr. Barden's "arguments" in the press release constitute 'pure opinion,'" attempting to disclaim any involvement in making the defamatory statement. However, it is not Mr. Barden's statement, nor his opinion, that it at issue here. At issue here is Defendant's statement – a statement attributable to her, that she approved, whose publication she "command[ed]," and for which she hired a public relations representative to disseminate to at least 30 journalists for publication. While Mr. Barden could possibly have had his own opinion as to whether or not his client abused Ms. Giuffre, Defendant cannot express an opinion on a binary, yes/no subject where she knows the truth. As this Court previously articulated, "statements that Giuffre's claims 'against [defendant] are untrue,' have been 'shown to be untrue,' and are 'obvious lies' have a specific and readily understood factual meaning." *Giuffre v. Maxwell*, 165 F. Supp. 3d at 152. Again, at the very least, the jury must pass on such issues.

D. The Pre-Litigation Privilege Does Not Apply to Defendant's Press Release

1. Defendant fails to make a showing that the pre-litigation privilege applies.

Defendant's next argument seeks refuge in the pre-litigation privilege. If we understand the argument correctly, Defendant seems to be saying that because she was contemplating an (unspecified and never-filed) lawsuit involving the British Press, she somehow had a "green light" to make whatever defamatory statements she wanted about Ms. Giuffre. To prove such a

remarkably claim, Defendant relies on caselaw involving such mundane topics as "cease and desist" letters sent to opposing parties and the like. Obviously such arguments have no application to the press release that Defendant sent out, worldwide, attacking Ms. Giuffre's veracity.

The problems with the Defendant's argument are legion. For starters, there is no record evidence – not even Defendant's own testimony – suggesting that she was contemplating litigation against Ms. Giuffre, or that her press release was related to contemplated litigation against Ms. Giuffre. Tellingly, the only "evidence" Defendant cites of any alleged contemplated litigation is the self-serving, *post hoc,* partial waiver of attorney-client privilege found in the Barden Declaration. As discussed above, that Declaration fails to establish that there was good faith anticipated litigation between her and Ms. Giuffre, particularly when evidence in the record contradicts such assertions. At the very least, it is a matter of fact for the jury to decide.

In another case in which a defendant attempted to claim pre-litigation privilege applied to statements made to the press, this Court denied summary judgment, and held, "[t]o prevail on a qualified privilege defense [defendant] must show that his claim of privilege does not raise triable issues of fact that would defeat it." *Block v. First Blood Associates*, 691 F. Supp. 685, 699-700 (Sweet, J.) (S.D.N.Y. 1988) (denying summary judgment on the pre-litigation qualified privilege affirmative defense because there was "a genuine issue as to malice and appropriate purpose"). Defendant's claim here likewise fails.

First, Defendant's testimony makes no mention of any contemplated lawsuit – much less, any contemplated lawsuit against Ms. Giuffre. Second, Defendant has offered no witnesses who will testify that she intended to bring any law suit. Third, she did not, in fact, bring any such lawsuit. The only "evidence" is a *post hoc* Declaration written by her attorney. Finally, it must be

remembered, as explained at length above, the Defendant had sexually trafficking Defendant and was attempting to continue to conceal her criminal acts. Whether her statements had an "appropriate purpose," *Block* 691 F. Supp. at 699-700 (Sweet, J.) – or were, rather, efforts by a criminal organization to silence its victims – is obviously contested. Accordingly, obvious issues of fact exist as to whether or not Defendant contemplated litigation.

Distorting reality, Defendant further argues: "Statements pertinent to a good faith anticipated litigation made by attorneys (or their agents under their direction) before the commencement of litigation are privileged." (MSJ at 33). The record evidence shows that Defendant's attorney did not make the defamatory statement. Further, Defendant's attorney's agents did not make the defamatory statement. Defendant did. And, there was no statement made by anyone "before the commencement of litigation" because *litigation never commenced*. Accordingly, the cases Defendant cites where attorneys are making statements (or where clients are making statements to their attorneys regarding judicial proceedings including malpractice) are wholly inapposite as detailed below.[45]

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- *Front v. Khalil*, 24 N.Y.3d 713, 720 (2015) - statement made by attorney.
- *Flomenhaft v. Finkelstein*, 127 A.D.3d 634, 637 n.2, 8 N.Y.S.3d 161 (N.Y. App. Div. 2015) - did not even address pre-litigation privilege, and said that Front, Inc. was not relevant to the case.
- *Kirk v. Heppt*, 532 F. Supp. 2d 586, 593 (S.D.N.Y. 2008) - the communication at issue was made by an attorney's client to the attorney's malpractice carrier concerning the client's justiciable controversy against the attorney over which the clients actually sued.
- *Petrus v Smith*, 91 A.D.2d 1190 (N.Y.A.D.,1983) - the court held: "[r]emarks of attorney to Surrogate are cloaked with absolute immunity as statements made in course of judicial proceedings – Attorney's gratuitous opinion outside courthouse calling plaintiff liar . . . is not similarly immune." (This case undermines the false argument Defendant tries to make).
- *Klien* - contrary to dicta quoted by Defendant from the Klein case, there were no communications made "between litigating parties or their attorneys," just a press release Defendant instructed her press agent to disseminate to the media.
- *Frechtman v. Gutterman*, 115 A.D.3d 102, 103, 979 N.Y.S.2d 58, 61 (2014) - the communication at issue was a letter sent by a client to his attorney terminating the representation for malpractice.
- *Sexter & Warmflash, P.C. v. Margrabe*, 38 A.D.3d 163 (N.Y.A.D. 1 Dept. 2007) - privilege applied to letter client sent discharging law firm as the client's attorneys as statements relating to a judicial proceeding and law firm sued for defamation.

Similarly, in *Black v. Green Harbour Homeowners' Ass'n, Inc.*, 19 A.D.3d 962, 963, 798 N.Y.S.2d 753, 754 (2005), cited by Defendant, the Court held a privilege applied to a letter sent by a home owner's association board of directors to the association's members informing them of the status of litigation to which the association was a party, and to the association's letter to the state attorney general sent to discharge it's duties to the association. In this case, litigation was actually pending, the communication was sent by a party to that litigation as part of its duties, and the communication itself concerned the litigation. Defendant's press release fits none of those descriptions.

Unsurprisingly, Defendant cites to no case in which a Court has held that this or any qualified privilege extends to internationally disseminated press releases defaming a non-party to the purported "anticipated" litigation. Regardless of whether or not Barden had a hand in drafting the statement (another disputed issue of fact for the jury), Defendant issued the statement, instructed that it be published, and the statement she issued was attributed to her, and not to her attorney (or his agents). Accordingly, all the case law Defendant cites about an ***attorney*** making a statement (or a client making a statement to their attorney or malpractice carrier) is inapposite.

2. <u>Defendant is foreclosed from using the pre-litigation privilege because she acted with malice</u>.

In any event, because Defendant acted with malice, she cannot avail herself of the pre-litigation privilege. As this Court has explained denying Defendant's motion to dismiss, "'There is no qualified privilege under New York law when such statements are spoken with malice, knowledge of their falsity, or reckless disregard for their truth.'" *Giuffre v. Maxwell*, 165 F. Supp. 3d at 155 (citing *Block*, 691 F. Supp. at 699 (Sweet, J.) (S.D.N.Y. 1988). There is ample record evidence that Defendant acted with malice in issuing the press release, thereby making the litigation privilege inapplicable. *See Block*, 691 F. Supp. at 700 (Sweet, J.) ("Here, sufficient

evidence has been adduced to support the inference that [defendant] acted with malice, and may not, therefore, claim a qualified privilege under New York law . . . a genuine issue as to malice and appropriate purpose has properly been raised and is sufficient to preclude summary judgment."). For example, Ms. Sjoberg testified that Defendant recruited her for sex with Epstein, thus corroborating Ms. Giuffre's own account of Defendant's involvement in abusing her with Epstein. For another example, Jeffrey Epstein's pilot testified that Defendant flew with Ms. Giuffre on at least 23 flights, thus corroborating Ms. Giuffre's claims against Defendant. *See* McCawley Dec. at Exhibit 15, Rodgers Dep. Tr., at 34:3-10. For another example, Tony Figueroa testified that Defendant asked him for assistance in recruiting girls for Epstein – more testimony that corroborates Ms. Giuffre's claims against Defendant.

Defendant's statements that Ms. Giuffre was lying and her claims of sexual abuse were "obvious lies" were not pertinent to a good faith anticipated litigation but, instead, they were made for an inappropriate purpose – i.e., to bully, harass, intimidate, and ultimately silence Ms. Giuffre. As the record evidence shows, Defendant knew the statements were false because Defendant engaged in and facilitated the sexual abuse of this minor child, therefore, they were made for the inappropriate purpose of "bullying," "harassment," and "intimidation." *See Front v. Khalil*, 24 N.Y.3d 713, 720 (2015). Simply put, Defendant sexually trafficked Ms. Giuffre – and then tried to silence Ms. Giuffre to keep her crimes secret – circumstances that prevent her from using privileges designed to shield legitimate legal disputes from court interference.

New York case law fully confirms that pre-litigation qualified privilege does not apply to this case. Historically, statements made in the course of litigation were entitled to privilege from defamations claims "so that those discharging a public function may speak freely to zealously represent their clients without fear of reprisal or financial hazard." *Id.* at 718. A 2015 New York

Court of Appeals case somewhat extended this privilege by holding that statements made by attorneys prior to the commencement of the litigation are protected by a qualified privilege if those statements are pertinent to a good faith anticipated litigation. *Id.* at 718. ("Although it is well settled that statements made in the course of litigation are entitled to absolute privilege, the Court has not directly addressed whether statements made by an attorney on behalf of his or her client in connection with prospective litigation are privileged" . . . "to advance the goals of encouraging communication prior to the commencement of litigation" . . . "we hold that statements made prior to the commencement of an anticipated litigation are privileged, and that the privilege is lost where a defendant proves that the statements were not pertinent to a good faith anticipated litigation.").

The Court of Appeals' reason for allowing this qualified privilege could not be more clear: "When litigation is anticipated, attorneys and parties should be free to communicate in order to reduce or avoid the need to actually commence litigation. Attorneys often send cease and desist letters to avoid litigation. Applying privilege to such preliminary communication encourages potential defendants to negotiate with potential plaintiffs in order to prevent costly and time consuming judicial intervention." *Id.* at 719-20. Under this rationale, the *Khalil* court found that an attorney's letters to the potential defendant were privileged because they were sent "in an attempt to avoid litigation by requesting, among other things, that Khalil return the alleged stolen proprietary information and cease and desist his use of that information." *Id.* at 720.

Here, quite unlike *Khalil*, the Defendant's statements were (1) made by a non-attorney (Defendant through Gow); (2) concerning a non-party to any alleged anticipated litigation; (3) knowingly false statements; and (4) contained in a press release directed at, and disseminated to,

the public at large. Defendant's statements cannot be considered "pertinent to a good faith anticipated litigation," such that the qualified privilege should apply.

Finally, though it strains credulity to even entertain the prospect, if Defendant could make even colorable showings on these basic issues, it would remain an issue of fact for the jury to determine whether or not Defendant's press release, calling Ms. Giuffre's sex abuse claims "obvious lies," was any type of "cease-and-desist" statement or a statement that acted to "reduce or avoid" or resolve any "anticipated" litigation. Summary judgment is obviously inappropriate here as well.

3. Defendant cannot invoke the pre-litigation privilege because she has no "meritorious claim" for "good faith" litigation.

Finally, Defendant cannot prevail in asserting this qualified privilege because, in order to invoke this privilege, she must have "meritorious claims" for "good faith anticipated litigation." *Khalil* specifically states that for the qualified privilege to apply, the statements must be made "pertinent to a good faith anticipated litigation," and it does not protect attorneys . . . asserting wholly ***unmeritorious claims***, unsupported in law and fact, in violation of counsel's ethical obligations." *Khalil*, 24 N.Y.3d at 718, 720 (emphasis added). Defendant has neither "meritorious claims" nor "good faith anticipated litigation." Defendant cannot have a "meritorious claim" for "good faith anticipated litigation" against the press (or Ms. Giuffre) because Ms. Giuffre's reports of her sexual abuse are true, Defendant knows that they are true, and Defendant made a knowingly false statement when she called Ms. Giuffre a liar. Under these circumstances, Defendant has no "meritorious" claim to make in "good faith" relating to either Ms. Giuffre's statements or their coverage in the press, thereby making her defamatory statements wholly outside the protection of this qualified privilege. At the very least, the issue of

whether Defendant has meritorious claims against the press on the grounds that she did not abuse Ms. Giuffre is a question of fact for the jury to decide.

V. DEFENDANT HAS NOT - AND CANNOT - SHOW THAT HER DEFAMATORY STATEMENT IS SUBSTANTIALLY TRUE

Defendant next claims that her press release calling Ms. Giuffre a liar about her past sex abuse was somehow "substantially true." Here again, this is a highly disputed claim. On its face, to determine what is "substantially" true or not requires extensive fact finding, such as whether Defendant recruited Ms. Giuffre as a minor child for sex with Defendant's live-in boyfriend and convicted pedophile, Jeffrey Epstein. Accordingly, summary judgment is not appropriate. *See Mitre Sports Intern. Ltd. v. Home Box Office, Inc*., 22 F. Supp. 3d 240, 255 (S.D.N.Y.2014) (denying summary judgment because it would require the Court to decide disputed facts to determine whether the statement at issue was substantially true); *Da Silva v. Time Inc*., 908 F. Supp. 184, 187 (S.D.N.Y. 1995) (denying motion for summary judgment because there was a genuine issue of material act as to whether defamatory photo and caption were not true, stating "[i]n the instant case Da Silva's contention that she was a reformed prostitute at the time of photography and publication provides a rational basis upon which a fact-finder could conclude that the photograph was not substantially true").

Additionally, Defendant has remarkably not submitted any evidence that she did not recruit Ms. Giuffre for sex with Epstein. Nor has Defendant offered any evidence that her role in Epstein's household was not to recruit girls and young women for Jeffrey Epstein. Accordingly, summary judgment is inappropriate. *See Stern v. Cosby*, 645 F. Supp. 2d 258, 277 (S.D.N.Y. 2009) (because defendant had "not submitted any evidence to show that Statement 11 is substantially true, her motion for summary judgment as to Statement 11 is denied").

Further, much of the purported evidence upon which Defendant relies to allege the truth of her defamatory statement is merely hearsay, including inadmissible hearsay statements made by Alan Dershowitz, who Defendant did not depose in this case (and whom Ms. Giuffre has not had an opportunity to cross examine). Hearsay cannot establish the truth of a defamatory statement as a matter of law at summary judgment. *Lopez v. Univision Communications, Inc*., 45 F. Supp.2d 348, 359 (S.D.N.Y.1999) (denying summary judgment and holding "defendants' evidence as to what they were told by representatives of NYU and Kean College, to the extent offered for the truth of the matters asserted, is inadmissible hearsay and an insufficient basis upon which to grant summary judgment of dismissal on the ground that the statements were substantially true.").

Finally, many of the facts upon which Defendant bases her argument that her defamatory statement was true are wholly tangential to the claims against her by Ms. Giuffre and the defamatory statement. For example, Defendant supports her contention that she did not recruit Ms. Giuffre for sex with Epstein based on the fact that Ms. Giuffre lived independently of her parents before meeting Epstein and Ms. Maxwell. (Of course, a child outside the supervision of her parents makes it much more likely she would be recruited by Defendant into sex trafficking, but that is for the jury to decide.) That fact does not go to whether or not Defendant's statement calling Ms. Giuffre a liar is true, because Ms. Giuffre never made any claims relating to where she lived prior to meeting Defendant**.** Moreover, it is immaterial with whom she was living: the fundamental and overarching fact remains that Defendant recruited Ms. Giuffre for sex with Epstein when she was a minor child.

Defendant next proffers Ms. Giuffre's limited high school enrollment and short-term jobs that she held as evidence that she and Epstein did not abuse her. The logic of this position is

unclear. The fact that Ms. Giuffre worked at Taco Bell for a few days hardly establishes she was not abused by Defendant and Epstein. Indeed, if anything its shows the vulnerability of Ms. Giuffre to enticements that a billionaire and his wealthy and powerful girlfriend could offer. In any event, what to make of such fact is something for the jury to consider. They are irrelevant for the same reason as above: Ms. Giuffre never made any claims about her studies or her prior employment. Indeed, neither Ms. Giuffre's statement about being recruited by Defendant as a child, nor Defendant's refutation even mentions Ms. Giuffre's lack of schooling or lack of a stable home as a child. Purported facts that have nothing to do with Ms. Giuffre's claims of sexual abuse against Defendant, and nothing to do with Defendant calling Ms. Giuffre a liar for such claims, do not establish the "*substantial* truth" of Defendant's statement. Tellingly, Defendant cites to no analogous case in any jurisdiction that even suggests otherwise.

VI. PLAINTIFF DOES NOT NEED TO ESTABLISH MALICE FOR HER DEFAMATION CLAIM, BUT IN THE EVENT THE COURT RULES OTHERWISE, THERE IS MORE THAN SUFFICIENT RECORD EVIDENCE FOR A REASONABLE JURY TO DETERMINE DEFENDANT ACTED WITH ACTUAL MALICE

Defendant's next (and, again, quite remarkable) argument is that Ms. Giuffre somehow will be unable to establish actual malice in this case. One would think that a sex trafficker calling one of her victims a liar would be a quintessential example of actual malice. Defendant's spurious case citations and misplaced argument do not detract from this core fact.

Though Defendant does not mention the legal standard for actual malice until she is 48 pages into her 68-page brief,[46] the legal definition of actual malice, as defined by the United

[46] Though perhaps a scrivener's error, Defendant errantly cites to two Supreme Court cases – *Gerts v. Robert Welch, Inc.*, 418 U.S. 323 (1974) and *Philadelphia Newspapers, Inc. v. Hepps*, 475 U.S. 767 (1986) – that arose out of the laws of Illinois and Pennsylvania, respectively, to support a proposition concerning New York law. Defendant also cites to *Harte-Hanks Commc'ns, Inc. v. Connaughton*, 491 U.S. 657, 109 S. Ct. 2678, 105 L. Ed. 2d 562 (1989), wherein the ruling was not at summary judgment, and the plaintiff in the defamation case was a judicial candidate in a public election.

States Supreme Court, and reiterated by the Second Circuit, should be the light by which all of Defendant's purported "facts" and argument should be viewed. "Actual malice" means that the statement was published with "knowledge that the statement was 'false or with reckless disregard of whether it was false or not.'" *Baiul v. Disson*, 607 F. App'x 18, 20 (2d Cir. 2015), quoting *New York Times Co. v. Sullivan*, 376 U.S. 254, 280, 84 S. Ct. 710, 11 L.Ed.2d 686 (1964).

Defendant argues that Ms. Giuffre is a limited purpose public figure. While Ms. Giuffre disputes that claim, the issue is entirely irrelevant here because Ms. Giuffre will prove at trial, with overwhelming evidence, that Defendant made her statement calling Ms. Giuffre a liar with malice, fully knowing – as a sex trafficker – that it was false. Put another way, Defendant knew that Ms. Giuffre was telling the truth when she described how Defendant recruited her for sex as an underage girl and then sexually trafficked her with her boyfriend Jeffrey Epstein.

The Second Circuit instructs that, "[o]n a motion for summary judgment, a court cannot try issues of fact; it can only determine whether there are issues to be tried. If, as to the issue on which summary judgment is sought, there is any evidence in the record from any source from which a reasonable inference could be drawn in favor of the nonmoving party, summary judgment is improper." *Chambers v. TRM Copy Ctrs. Corp.*, 43 F.3d 29, 37 (2d Cir. 1994) (internal citations and quotations omitted). "As the moving party, Defendants have the burden of demonstrating an absence of clear and convincing evidence substantiating Plaintiffs' claims." *De Sole v. Knoedler Gallery, LLC*, 139 F. Supp. 3d 618, 640 (S.D.N.Y. 2015) (citing *Chambers*).

Defendant fails to meet her burden of demonstrating an absence of clear and convincing evidence substantiating Ms. Giuffre's claims that Defendant acted with actual malice. Ms. Giuffre will easily be able to meet any trial burden of clear and convincing evidence of actual

malice. Tellingly, Defendant does not even attempt to address the documentary evidence, nor the testimonial evidence showing she was a recruiter of girls for Epstein.

As shown above, far beyond showing that a reasonable inference could be drawn in her favor, which is all that is required at this point to defeat Defendant's motion, Ms. Giuffre will easily be able to meet her trial burden of clear and convincing evidence of actual malice.

Of course, a plaintiff need only show "actual malice" on the part of a defendant if that plaintiff is a public figure or a limited public figure, which Ms. Giuffre is not, as explained *infra*.

VII. THE COURT NEED NOT REACH THE ISSUE, AT THIS TIME, OF WHETHER MS. GIUFFRE IS A LIMITED PURPOSE PUBLIC FIGURE

For the reasons just explained, Ms. Giuffre will easily be able to prove actual malice at the trial in this case. Defendant argues that Ms. Giuffre "is a public figure who must prove actual malice." MSJ at 49. Given the overwhelming proof of the second part of that statement, the Court need not spend its time considering the first.

If the Court wishes to nonetheless consider the issue at this time, it is not appropriate for disposition at the summary judgment stage of this case. The defendant bears the burden of demonstrating that the plaintiff is a limited purpose public figure. *See Lerman v. Flynt Distrib. Co.*, 745 F.2d 123, 136–37 (2d Cir. 1984). Defendant correctly articulates the legal test for a finding that a plaintiff is a limited purpose public figure, but glosses over the fact that all prongs of the test must be met in order for a court to make that finding. *See, e.g.*, *Contemporary Mission, Inc. v. N.Y. Times Co.*, 842 F.2d 612, 617 (2d Cir. 1988) ("[T]his court set forth a ***four part test*** for determining whether someone is a limited purpose public figure" (emphasis added)); *Herbert v. Lando*, 596 F. Supp. 1178, 1186 (S.D.N.Y. 1984) ("The Second Circuit recently summarized the ***criteria***" (emphasis added)), *aff'd in part, rev'd in part*, 781 F.2d 298 (2d Cir. 1986); *cf. Nehls v. Hillsdale Coll.*, 178 F. Supp. 2d 771, 778 (E.D. Mich. 2001) (finding plaintiff

was not a limited public figure for failing one element of the *Lerman* test and thus denying defendant's motion for summary judgment) ("The defendant has proven all of the elements but the third …"), *aff'd*, 65 F. App'x 984 (6th Cir. 2003). Of course, proof that Ms. Giuffre (or anyone else) is a limited purpose public figure requires proof of a set of facts from which Ms. Giuffre believes Defendant has not shown in satisfaction of the four-part test.

Significantly –this Court should pause here to note that the details of Jane Doe 3's sexual exploitation and abuse, as anonymously set forth in her CVRA joinder motion, ***caused the Defendant to identify, with certainty, Jane Doe 3 as Ms. Giuffre***. Yet, at her deposition, Defendant claimed to "barely remember her at all."[47] Defendant's ability to immediately and positively identify the anonymous individual making claims of sexual abuse, if anything, shows that Defendant was intimately aware of Ms. Giuffre's sexual exploitation.

And, to be sure, Ms. Giuffre never asked to be sexually abused or trafficked by Defendant or convicted pedophile Jeffrey Epstein when she was a child – legally, she did not even have the capacity to consent. Defendant cannot recruit a minor child for sexual exploitation and then, afterwards, argue that her victim injected herself into the public controversy when coming forward about the abuse she suffered.

Moreover, Defendant has not made a sufficient showing that Ms. Giuffre has "regular" and "continuing" access to the news media. The policy rationale behind this prong is that public figures generally enjoy significant access to the media. One reporter wrote some articles on Ms. Giuffre in 2011. Thereafter, it was not until 2015, that Ms. Giuffre spoke to someone in the news media about these issues, and that interview was granted ***after*** Defendant's defamatory remarks. Such limited contacts precludes a finding that Ms. Giuffre is a limited public figure. *See*

[47] *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 44:23-45:4 (July 22, 2016) ("Q. You do remember Virginia, about that time back in the 2000s, giving Mr. Epstein massages? A. I barely remember her at all.").

Hutchinson v. Proxmire, 443 U.S. 111, 99 S. Ct. 2675, 61 L.Ed.2d 411 (1979) (finding plaintiff maintained no regular and continuing access to the media and thus was not a public figure).

It is also unclear how Defendant plans to show that Ms. Giuffre "successfully invited public attention to her views." To be sure, Ms. Giuffre decided to start "Victims Refuse Silence," a not-for-profit organization whose mission is "to change the landscape of the war on sexual abuse and human trafficking. Our goal is to undertake an instrumental role in helping survivors break the silence associated with sexual abuse. To fulfill this mission, we aim to enhance the lives of women who have been victimized."[48] The website lists the National Trafficking Hotline, and provides a state-by-state resources for local organizations where victims can seek help. Unsurprisingly, Defendant cites no cases that hold that maintaining a website makes one a public figure. *See Mitre Sports Int'l Ltd. v. Home Box Office, Inc.*, 22 F. Supp. 3d 240, 252 (S.D.N.Y. 2014) (finding plaintiff was not a limited public figure and denying defendant's motion for summary judgment) ("corporate policy denouncing child labor on its website … do[es] not show that Mitre … aimed to influence the public's views on the controversy"). More important, Defendant does not explain how Ms. Giuffre was using the website to influence public views on whether she had been abused by Defendant – the subject at issue in this lawsuit.

Interestingly, Defendant has spent $ 17,875[49] on an expert witness to tell the Court and the jury that hardly anyone searches on the internet using search terms such as "victims refuse silence sex slave." One of Defendant's six briefs raising *Daubert* issues specifically argues that Dr. Anderson's estimates on the cost of remediating Ms. Giuffre's online reputation are improper because Dr. Anderson included nearly unused search phrases when evaluating internet content. Kent's rebuttal report states: ". . . there seems no reason to believe that such a person would use

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[48]http://www.victimsrefusesilence.org/our-mission.
[49] *See* McCawley Dec. at Exhibit 9, Kent Dep. Tr. at 25:16-26:6.

this term . . . Indeed, these are terms unlikely to be used by anyone unfamiliar with this litigation. . . . Why, for instance, would it be necessary to push down offending Web pages in the results that the search engines provide for the term victim's refuse silence sex slave, when this term is likely never used . . ." *See* McCawley Dec. at Exhibit 25, Kent Report at 10, 33.

Defendant cannot argue to the Court that Ms. Giuffre has "successfully" invited public attention to her views through her VRS website while simultaneously filing a *Daubert* motion that argues that search terms such as "victims refuse silence sex slave" are "likely never used," thus making the website unsuccessful in inviting public attention. In any event, Defendant has failed to set forth with precision the allegedly undisputed fact – and supporting evidence – she uses to support her argument.

Moreover, "[i]t is preferable to reduce the public figure question to a more meaningful context by looking to the nature and extent of *an individual's participation in the particular controversy giving rise to the defamation*." *Greenberg v. CBS Inc.*, 69 A.D.2d 693, 704, 419 N.Y.S.2d 988, 995 (1979) (emphasis added), citing *Gertz v. Robert Welch, Inc.*, 418 U.S. 323, 345, 352, 94 S. Ct. 2997, 41 L.Ed.2d 789. The context here is highly significant. Ms. Giuffre never chose to participate in Defendant and Epstein's underage sex ring, a "controversy" that gave rise to Defendant's defamation. In arguing that Ms. Giuffre thrust herself into the public spotlight, Defendant conveniently leaves out the fact that it is by her doing that Ms. Giuffre is in this controversy in the first place. No minor child willingly becomes a participant in sexual abuse, and it is perverse for the abuser to argue that her victim deliberately became a subject of public attention when speaking out about that abuse for the purpose of advancing justice and helping other victims.

For all these reasons, the Court should simply decline to decide the public figure issue at this juncture. But if it chooses to reach the issue, it should reject Defendant's unsupported argument.

VIII. THE JANUARY 2015 STATEMENT WAS NOT "SUBSTANTIALLY TRUE," AND MS. GIUFFRE HAS PRODUCED CLEAR AND CONVINCING EVIDENCE OF ITS FALSITY

As a final argument, Defendant argues that her January 2015 statement was "substantially true." Given that the statement argues that Ms. Giuffre lied when she said she was sexually trafficked by Defendant, the reader of Defendant's motion might reasonably expect to see some evidence presented showing that Defendant was not a sex trafficker. Instead, the reader is treated to technical quibbles. For example, the lead argument to show the "substantial" truth of Defendant's statement is the argument that Ms. Giuffre was not fifteen years old, but all of sixteen or seventeen years old when she was trafficked. As the Court knows (and can take judicial notice of), Florida law makes age eighteen the age of consent. Accordingly, it is no moment that Ms. Giuffre may have been mistaken about the exact year the sex trafficking started. Call this the "yes-I'm-a-sex-trafficker-but-only-of-sixteen-year-old-girls" defense. To even describe the defense is to show how meritless it is.

More broadly, at issue are the statements Ms. Giuffre made regarding Defendant's involvement in, and knowledge of, the sexual abuse and sex trafficking of Ms. Giuffre (and other minor girls) through a recruitment scheme executed by Defendant and Jeffrey Epstein. In response to those various statements, Defendant publicly claimed that, "the allegations made by (Ms. Giuffre) *against* Ghislaine Maxwell are untrue." Defendant continued that Ms. Giuffre's "claims are obvious lies and should be treated as such...." Defendant, through her statement

intended to convey that Ms. Giuffre was lying about everything she had said against Defendant – "the allegations."

In sum and essence, those statements made by Ms. Giuffre about which Defendant released a public statement to exclaim were "untrue" and "obvious lies" were:

(1) That Defendant approached Ms. Giuffre while Ms. Giuffre was an underage minor working at the Mar-a-Lago Country Club, and recruited the then-minor Ms. Giuffre to go to the house of Jeffrey Epstein under the pretense of providing a massage to Jeffrey Epstein for money;

(2) That Ms. Giuffre followed Defendant's instructions, and was driven to Jeffrey Epstein's house, where she was greeted by Defendant and later introduced to Jeffrey Epstein;

(3) That Ms. Giuffre was lead upstairs to be introduced to Jeffrey Epstein in his bedroom, and that while there Defendant demonstrated how Ms. Giuffre should provide a massage to Jeffrey Epstein;

(4) That Defendant and Epstein converted the massage into a sexual experience, requesting that Ms. Giuffre remove her clothing, after which time a sexual encounter was had;

(5) That Defendant and Epstein expressed approval for Ms. Giuffre, and offered her money in exchange for this erotic massage turned full sexual encounter;

(6) That Defendant and Epstein offered Ms. Giuffre the promise of money and a better life in exchange for Ms. Giuffre acting sexually compliant and subservient to their demands;

(7) That Ms. Giuffre, after that first encounter, was repeatedly requested to service Epstein and/or Defendant sexually and/or others;

(8) That Ms. Giuffre was taken on Epstein's private planes on numerous occasions and trafficked nationally and internationally for the purpose of servicing Epstein and others, including Defendant, sexually;

(9) That Defendant was Epstein's primary manager of the recruitment and training of females who Epstein paid for sexual purposes;

(10) That Defendant participated in sexual encounters with females, including Ms. Giuffre; and

(11) That Ms. Giuffre and other recruited females were encouraged by Defendant and Epstein to bring other young females to Epstein for the purpose of servicing him sexually.

Defendant, by way of her January 2015 statement, declared that Ms. Giuffre lied about each and every one of these allegations regarding Defendant. In fact, Defendant clarified further this position in her deposition when she said repeatedly that everything Ms. Giuffre said about Defendant was totally false.[50] The clarification in her deposition is identical in intention to the reasonable interpretation of her statement that Defendant made publicly, which has formed the basis of this defamation action—that Ms. Giuffre was lying about everything she said about Defendant, and that Defendant was not at all involved in the activity she was accused of engaging in.

While her public statement could not have been more clear, as her deposition testimony further underscored, Defendant intended the world to believe that nothing Ms. Giuffre said about Defendant was true, and that Defendant was not at all involved with any of the things she was accused of, Defendant has decided in this motion to minutely dissect the nuance of Ms. Giuffre's various statements to cause the Court to reach a far-fetched conclusion that Defendant's insidiously false statement was somehow "substantially true." Ironically, this repositioning amounts to nothing more than an admission by Defendant of the defamatory nature of her statement.

A. When Ms. Giuffre Initially Described Her Encounters With Defendant and Epstein, She Mistakenly Believed the First Encounter Occurred During the Year 1999.

Discovery has resulted in the production of records, including Ms. Giuffre's employment records from Mar-a-Lago, which she did not possess at the time she was recounting her interactions with Defendant. Those records establish that the initial encounter wherein Defendant recruited Ms. Giuffre occurred during the year 2000 and not during 1999. Ms. Giuffre was

[50] *See* McCawley Dec. at Exhibit 11, Maxwell 4-22-2016 Dep. Tr. at 135:3-4; 178:15-178:24; 179:20-180:7; 228:7-229:10.

sixteen years old before August 9, 2000, and turned seventeen on that date. It is unclear from the limited records available whether Defendant approached and recruited Ms. Giuffre before or just after Ms. Giuffre's 17th birthday. However, what has now been established through numerous witnesses is that Defendant approached and recruited a minor child for the purposes of enticing that minor over to the house of Jeffrey Epstein, a currently-registered sex offender.[51] The exact lure of Ms. Giuffre by Defendant - enticement of being paid money to give a billionaire a massage at his mansion - was used by Epstein and his many associates and employees to recruit dozens and dozens of other underage girls. There is no doubt that the crux of Ms. Giuffre's statement on this point is that Defendant recruited her when she was only a minor child unable to consent to sex, not precisely how far under the age of consent she was. Defendant's public claim that Ms. Giuffre's account of this approach, and recruiting element, was "untrue" and "obvious lies" is not "substantially true," but is itself an obvious lie – as Ms. Giuffre will prove to the jury at trial.

B. Defendant's January 2015 Statement Claiming as "Untrue" and an "Obvious Lie" the Allegation That She Regularly Participated in Epstein's Sexual Exploitation of Minors and That the Government Knows Such Fact is Not Substantially True But Instead Completely False.

Defendant next argues that she "accurately denied that [she] 'regularly participate[d] in Epstein's sexual exploitation on minors' and that 'the Government knows such fact.'" MSJ at 58. It is not clear whether Defendant is nitpicking this statement by contesting whether she "regularly" participated in Epstein's sexual exploitation or whether she did participate, but the Government was unaware of the extent of her involvement. Call this the "yes-I'm-a-sex-trafficker-but-only-on-Tuesdays-and-Thursdays" defense – here again, to simply recount the claim is to see its absurdity.

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[51] *See* McCawley Dec. at Exhibit 1, 5, Alessi Dep. Tr. at 94:24-95:2; Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12.

Contrary to Defendant's misleading, cherry-picked fragments of information she has chosen to use to support her point, there is an abundance of evidence clearly linking Defendant to Epstein's sexual exploitation of minors. As the Court is aware, numerous message pads were recovered from Epstein's home indicating Defendant's involvement in and knowledge of Epstein's illegal exploitation. [52] Additionally, numerous employees and others have testified about Defendant's high-ranking position in the hierarchal structure of the sexual exploitation scheme. [53] In fact, multiple individuals, in addition to the Ms. Giuffre, have testified about Maxwell's involvement in the exploitation of minors, including Ms. Giuffre.[54]

Defendant also argues that one government investigator, Palm Beach, Florida, Detective Recarey, may not have been aware of her involvement in the sex trafficking. Defendant fails to cite another passage in Detective Recarey's deposition, where he noted that he was aware of Defendant's involvement with Epstein and the sexual exploitation of children.[55] But even assuming Recarey was unaware (which Ms. Giuffre strongly disputes), Defendant would have, at most, a "yes-I'm-a-sex-trafficker-but-I-successfully-hid-it-from-one-of-the-cops" defense – again, not a likely claim.

More broadly, Ms. Giuffre's statement about what the "Government" knew about sex trafficking was made in pleadings filed in a *federal* Court case attacking the decision of the U.S. Attorney's Office for the Southern District of Florida to offer Jeffrey Epstein immunity from prosecution for *federal* sex trafficking crimes. Accordingly, to present an even arguable claim for summary judgment, Defendant would have to show that the U.S. Attorney's Office (and its

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[52] *See*, *e.g.*, McCawley Dec at Exhibit 28 (message pad excerpts), GIUFFRE 001412, 001418, 001435, 001446, 001449, 001453, 001454.
[53] *See* McCawley Dec. at Exhibit 21, 1, Rodriguez Dep. Tr. at 169:1-169:4; Alessi Dep. Tr. at 23:11-23:20; 34:19-35:3; 98:5-98:12; 104:15-104:23.
[54] *See* McCawley Dec. at Exhibit 16, 4, Sjoberg Dep. Tr. at 13; Figueroa Dep. Tr. at 96-97; 103; 200:6-18; 228:23-229:21.
[55] *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 29:16-29:20; 45:13-25; 83:3-83:15.

investigators from the FBI) did not know about Defendant's sex trafficking. This proof would need to include, for example, evidence that the FBI did not learn about Defendant's sex trafficking when (among other things) Ms. Giuffre told FBI agents about it when she met with them in Australia in 2011. Here again, Defendant has no evidence to even begin making such a showing.

C. Defendant's January 2015 Statement Claiming as "Untrue" or an "Obvious Lie" That Maxwell and Epstein Converted Ms. Giuffre Into a Sexual Slave is Not Substantially True.

Defendant next argues that she accurately disputed Ms. Giuffre's statement that Defendant held her as a "sex slave." Relying on dictionary definitions of "slave" that define the term to refer to a "confined" person who is the "legal property" of another (MSJ at 59, citing *Merriam-Webster*, etc.), Defendant claims Ms. Giuffre was not confined or the property of Defendant. Call this the "yes-I'm-a-sex-trafficker-but-I-didn't-use-chains" defense. And, once again, to even describe the defense is to refute it.

Defendant does not explain why the jury would be required to use the held-in-chains definition of "slave" in evaluating her statement. *Merriam-Webster* (11th ed. 2006) also defines "slave" as "one that is completely subservient to a dominating influence" – a definition that fits Ms. Giuffre's circumstances to a tee. As Ms. Giuffre has explained in detail, she was recruited as a minor child by Defendant, who then dominated her and used for sexual purposes. That testimony alone creates a genuine issue of fact on this point.

From the context of all of Ms. Giuffre's statements about Defendant, Ms. Giuffre has never said or implied that she was physically placed in a cage. Instead, she has described the vast disparity of power and the influence of Defendant and Epstein, the fear of disobedience, the typical locations of the abuse being in a private plane, in huge mansion manned with Epstein employed servants, a private island, or some inescapable place abroad in the presence of

Defendant, in addition to the continued – and fraudulent – promise of a better future, as those things that kept her retained in a situation of sexual servitude. While not physical chained, Ms. Giuffre was groomed as minor and trained, and these factors became her invisible chains. Indeed, as Ms. Giuffre's expert on sex trafficking, Professor Coonan, has explained:

> Popular understandings of the term "sex slave" might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the "invisible chains" of fraud and psychological coercion.

See McCawley Dec. at Exhibit 23, Coonan Expert Report at 20.

If the Court takes as true, which it must for the purpose of this motion, that Ms. Giuffre was trafficked and used exclusively for sexual purposes by Defendant and Epstein, then the Court must also reach the conclusion at this stage that Maxwell's assertion – that Ms. Giuffre's description of being a sex slave is "untrue" or "obvious lies" – is not substantially true. There undoubtedly remains a genuine issue of material fact on this point, and in fact, Defendant's position taken in this motion is tantamount to an admission of the truth of Plaintiff's statement about Defendant on this point.

D. Any Statement of Misdirection Regarding Professor Alan Dershowitz is Nothing More Than an Irrelevant Distraction to The Facts of This Case and Matters Not on the Defense of Whether Defendant's Statement Was Substantially True.

Defendant next contends that she accurately recounted that Alan Dershowitz had denied having sex with Ms. Giuffre. MSJ at 60. Call this the "yes-I'm-a-sex-trafficker-but-she-was-not-trafficked-to-the-professor" defense. While it is accurate that Ms. Giuffre made allegations against Professor Dershowitz, those allegations are not at issue in this case. Defendant, in her defamatory statement, claimed that "the allegations made by [Ms. Giuffre] <u>against Ghislaine Maxwell</u> are untrue." *See* McCawley Dec. at Exhibit 26, GM_00068. In her deposition,

Defendant maintained the position that she "cannot speculate on what anybody else did or didn't do." *See* McCawley Dec. at Exhibit 11, Maxwell 4-22-2016 Dep. Tr. at 180:3-180:4. In fact, regarding Ms. Giuffre's claims about others, Defendant unequivocally stated, "I can only testify to what she said about me, which was 1000 percent false." *See* McCawley Dec. at Exhibit 11, Maxwell 4-22-2016 Dep. Tr. at 228:10-228:12.

Defendant Maxwell makes additional misstatements about Dershowitz's production in a defamation action filed against him in her desperate attempt to have Dershowitz to jump aboard and help bail out her sinking canoe. While Ms. Giuffre can – and, if necessary, will – refute Dershowitz's claim he was not a beneficiary of Epstein and Defendant's sex trafficking, that is not relevant at this stage. Whatever may or may not have happened with Dershowitz (and Ms. Giuffre's sworn statements that he sexually abused her is alone enough to create disputed facts on the issue of whether Defendant's statements about him were "substantially true") has no bearing whatsoever on the truth or falsity of the statements Ms. Giuffre made about Defendant.

This case is not about whether Ms. Giuffre has ever made untruthful allegations against anyone, which she contends she has not, but about whether her allegations about Defendant were true, or whether those specific allegations were "untrue," "obvious lies" as Defendant publicly proclaimed. These issues are disputed and must go to the jury.

E. Contrary to Defendant's Position, There is a Genuine Issue of Material Fact as to Whether She Created or Distributed Child Pornography, or Whether the Government Was Aware of Same.

Defendant next argues that she did not create child pornography and that the Government knew this. Call this the "until-you-find-the-photos-I'm-innocent" defense. Of course, as noted earlier, Defendant's claim requires that she show that "the Government" – in context, the FBI and the U.S. Attorney's Office for the Southern District of Florida – "knew" that she had no

child pornography. Yet Defendant has offered no such evidence – much less evidence so powerful as to warrant summary judgment on this point.

This point is disputed from the simple fact that Ms. Giuffre herself testified that Defendant took many photograph of her naked. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 232:3-9; 233:7-9. This is consistent with the Palm Beach butler's, Alfredo Rodriguez's, testimony that he personally saw photos of naked children on Defendant's computer. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 150:10-17; 306:1-306:24. Another housekeeper, Juan Alessi also saw photos of young nude females on Defendant's computer, although he wasn't sure whether to consider it pornography. *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 175:5-175:24. Finally, Detective Recarey found a collage of nude photos of young females in Epstein's closet, and turned the photos over to the FBI and U.S. Attorney's office.[56] While the U.S. Attorney's office will not share the photos obtained from Recarey's investigation, it is thus undisputed that the government possesses photos of nude, young females confiscated from Epstein's Palm Beach mansion. Indeed, the police video disclosed through a FOIA request shows naked images of women throughout the house, including a full nude of the Defendant.[57] At a minimum, there is a clear genuine issue of material fact in this regard.

F. Defendant Did Act as a "Madame" For Epstein to Traffic Ms. Giuffre to The Rich and Famous.

Defendant next argues that she did not act as a "Madame" for Epstein. MSJ at 63. The gist of the argument seems to be that Defendant believes trafficking one girl to Epstein does not a Madame make. Call this the "yes-I-was-Virginia's-Madame-but-no-one-else's" defense. This argument fails linguistically on the very dictionary definitions that Defendant cites elsewhere –

[56] *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 73:19-73:24; 74:2-74:7.
[57] *See* McCawley Dec. at Exhibit 44, FOIA CD GIUFFRE 007584.

but not here. *See Merriam-Webster* (11th ed. 2006) (defining "madam" as "the female head of a house of prostitution").

Once again, Defendant conceals the relevant facts on this issue. First, multiple witnesses have testified to Defendant's recruiting, maintaining, harboring, and trafficking girls for Epstein.[58] In fact, Defendant herself was unable to deny procuring Ms. Giuffre for Epstein.[59] While Defendant has attempted to fumble her way through explaining some plausible reason for bringing a sixteen or seventeen year old to Epstein, her explanations are, to put it blandly, unpersuasive. As with other issues, the jury will have to decide who to believe.

One of the individuals Ms. Giuffre was trafficked to was Prince Andrew – trafficking that took place in Defendant's own townhouse in London. There exist flight logs evidencing Ms. Giuffre flying to London alongside Defendant and Epstein on Epstein's private plane, and a photo of Ms. Giuffre, Defendant, and the Prince, without Defendant ever offering a legal reasonable explanation for that photo being taken, or for traveling with a year old girl overseas.

Defendant begins to meander somewhat aimlessly on this point, shifting Plaintiff's burden to substantiate Plaintiff's claim that Defendant was Epstein's Madame, which is a point at issue, into whether or not Plaintiff has conclusively proven the identities and accurate job titles of the other men to whom Plaintiff was lent for sex by Epstein. No matter how hard Defendant tries to reframe this case, drag other people in, or split hairs, she is unable to contest the facts – facts showing she was more than a Madame but a full-fledged sex trafficker. Ms. Giuffre told the truth when she said that Defendant recruited her as a minor, under the pretense of giving a

[58] *See* McCawley Dec. at Exhibit 16, 1, 18, 2, Sjoberg Dep. Tr. at 13; Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213; Austrich Dep. Tr. at 34-35, 100-101, 127-128; Alessi Dep. Tr. at 34:19-35:3; 98:5-98:12; 104:15-104:23.
[59] *See* McCawley Dec. at Exhibit 11, Maxwell Dep. Tr. at 214:14-215:3.

massage, and converted her into a traveling sex slave, consistent with Defendant and Epstein's pattern and practice.

As the Court astutely acknowledged early on, "at the center of this case is the veracity of a contextual world of facts more broad than the allegedly defamatory statements . . . either transgression occurred or it did not. Either Maxwell was involved or she was not." If Defendant was involved, then her January 2015 statement was defamatory. Ms. Giuffre will prove to the jury, through overwhelming evidence, her prior allegations about Defendant's involvement. The Court should give Ms. Giuffre that opportunity, and deny Defendant's motion for summary judgment.

IX. CONCLUSION

For the foregoing reasons, this Court should deny Defendant's motion for summary judgment in all respects.

Dated: January 31, 2017

Respectfully Submitted,

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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[60] This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah for this private representation.

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff, Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.
_______________________________/

SOUTHERN DISTRICT OF NEW YORK LOCAL RULE 56.1 PLAINTIFF'S STATEMENT OF CONTESTED FACTS AND PLAINTIFF'S UNDISPUTED FACTS

DEFENDANT'S PURPORTED FACTS

1. **Ms. Maxwell's response to publications of Ms. Giuffre's false allegations: the March 2011 statement**. In early 2011 Ms. Giuffre in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. In the articles, Ms. Giuffre made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, Ms. Giuffre suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies that the allegations she made against Ms. Maxwell are false. Furthermore, Ms. Giuffre did give an interview to journalist, Sharon Churcher, in which Ms. Giuffre accurately and truthfully described Defendant Maxwell's role as someone who recruited or facilitated the recruitment of young females for Jeffrey Epstein. *See* McCawley Dec. at Exhibit 34, GIUFFRE003678. Ms. Giuffre was also interviewed by the FBI in 2011 and she discussed Defendant's involvement in the sexual abuse. *See* McCawley Dec. at Exhibit 31, FBI Redacted 302, FIUFFRE001235-1246. Those statements were not "false and defamatory," but instead truthful and accurate.

DEFENDANT'S PURPORTED FACTS

2. In the articles, Ms. Giuffre alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre does not contest this fact, but believes that it is irrelevant.

DEFENDANT'S PURPORTED FACTS

3. In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies that Mr. Barden, "issued a statement." Instead it appears to have the contact as Ross Gow and a reference to Devonshire Solicitors.

DEFENDANT'S PURPORTED FACTS

4. The statement read in full:

> Statement on Behalf of Ghislaine Maxwell
>
> By Devonshires Solicitors, PRNE Wednesday, March 9, 2011
>
> London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false*.
>
> It is unacceptable that letters sent by Ms. Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.
>
> In the circumstances, *Ms. Maxwell is now proceeding to take legal action against those newspapers*.
>
> "I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.
>
> "A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

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GIUFFRE001067-68

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

The document speaks for itself although it is unclear if the original included the italics that are inserted by the Defendant above.

DEFENDANT'S PURPORTED FACTS

5. **Ms. Giuffre's gratuitous and "lurid" accusations in an unrelated action.** In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

While we would stipulate to the statement in this paragraph starting with the words "In 2008" , we do not stipulate to the opening sentence fragment Maxwell places in bold.

DEFENDANT'S PURPORTED FACTS

6. Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed.

DEFENDANT'S PURPORTED FACTS

7. The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[] of Mr. Epstein and the Government owed them CVRA duties." Yet, "the bulk of the [motion] consists of copious factual details that [Ms. Giuffre] and [her co-movant] 'would prove . . . if allowed to join.'" Ms.

Giuffre gratuitously included provocative and "lurid details" of her alleged sexual activities as an alleged victim of sexual trafficking.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies that the issues presented in here joinder motion were narrow. The issues presented by the joinder motion and related pleadings were multiple and complex, requiring numerous details about Ms. Giuffre's sexual abuse and the perpetrators of her abuse. In a pleading explaining why the motion was filed, Ms. Giuffre's lawyers specifically listed nine separate reasons why Jane Doe 3's allegations that Dershowitz had sexually abused her were relevant to the case and appropriately included in the relevant filings:

> 1. To establish that Jane Doe 3 had been sexually abused by Jeffrey Epstein and his co-conspirators (including co-conspirator Alan Dershowitz), which would make her a "victim" of a broad sex trafficking conspiracy covered by the federal Crime Victims' Rights Act, 18 U.S.C. § 3771, and therefore entitled to participate in the case;
>
> 2. To support then-pending discovery requests that asked specifically for information related to contacts by Dershowitz with the Government on behalf of Jeffrey Epstein;
>
> 3. To support the victims' allegation that the Government had a motive for failing to afford victims with their rights in the criminal process – specifically, pressure from Dershowitz and other members of Epstein's legal defense team to keep the parameters of the non-prosecution agreement (NPA) secret to prevent Jane Doe 3 and other victims from objecting to and blocking judicial approval of the agreement;
>
> 4. To establish the breadth of the NPA's provision extending immunity to "any potential co-conspirators of Epstein" and the scope of the remedy that the victims (including not only Jane Doe 3 but also other similarly-situated minor victims who had been sexually abused by Dershowitz) might be able to obtain for violations of their rights;
>
> 5. To provide part of the factual context for the scope of the "interface" between the victims, the Government, and Epstein's defense team – an interface that was relevant under Judge Marra's previous ruling that the Government was entitled to raise "a fact-sensitive equitable defense which must be considered in the factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims . . .";

> 6. To prove the applicability of the "crime/fraud/misconduct" exception to the attorney-client privilege that was being raised by the Government in opposition to the victims' motion for production of numerous documents;
>
> 7. To bolster the victims' argument that their right "to be treated with fairness," 18 U.S.C. § 3771(a)(8), had been violated through the Government's secret negotiations with one of their abusers;
>
> 8. To provide notice and lay out the parameters of potential witness testimony for any subsequent proceedings or trial – i.e., the scope of the testimony that Jane Doe 3 was expected to provide in support of Jane Doe 1 and Jane Doe 2, the already-recognized Ms. Giuffre in the action; and
>
> 9. To support Jane Doe 3's argument for equitable estoppel to toll the six-year statute of limitations being raised by the Government in opposition to her motion to join – i.e., that the statute was tolled while she was in hiding in Australia due to the danger posed by Epstein and his powerful friends, including prominent lawyer Alan Dershowitz.

Jane Does #1 and #2 v. United States, No. 9:08-cv-80736, DE 291 at 18-26 & n.17 (S.D. Fla. 2015). Ms. Giuffre's lawyers had attempted to obtain a stipulation from the Government on point #1 above ("victim" status), but the Government had declined. Judge Marra's ruling concluded that certain allegations were not necessary "at this juncture in the proceedings." DE 324 at 5. Judge Marra specifically added, however, that "Jane Doe 3 is free to reassert these factual details through proper evidentiary proof, should Petitioners demonstrate a good faith basis for believing that such details are pertinent to a matter presented for the Court's consideration." DE 324 at 6. The CVRA litigation continues and no trial has been held as of the filing of this brief. As such, the extent to which these factual details will be used at trial has not yet been determined. *See* Docket Sheet, *Jane Does #1 and #2 v. U.S.*, No. 9:08-cv-80736.

<u>DEFENDANT'S PURPORTED FACTS</u>

8. At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre's name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

9. As the district court noted in ruling on the joinder motion, Ms. Giuffre "name[d] several individuals, and she offers details about the type of sex acts performed and where they took place." The court ruled that "these lurid details are unnecessary": "The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . ., especially considering that these details involve non-parties who are not related to the respondent Government." Accordingly, "[t]hese unnecessary details shall be stricken." *Id.* The court then struck all Ms. Giuffre's factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. The court said the striking of the "lurid details" was a sanction for Ms. Giuffre's improper inclusion of them in the motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

10. The district court found not only that the "lurid details" were unnecessary but also that the entire joinder motion was "entirely unnecessary." Ms. Giuffre and her lawyers knew the motion with all its "lurid details" was unnecessary because the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied Ms. Giuffre's joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

11. One of the non-parties Ms. Giuffre "named" repeatedly in the joinder motion was Ms. Maxwell. According to the "lurid details" of Ms. Giuffre included in the motion, Ms. Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:

- Ms. Maxwell "approached" Ms. Giuffre in 1999 when Ms. Giuffre was "fifteen years old" to recruit her into the scheme.
- Ms. Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities."
- Ms. Maxwell was a "primary co-conspirator" with Epstein in his scheme.

- She "persuaded" Ms. Giuffre to go to Epstein's mansion "in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children."
- At the mansion, when Ms. Giuffre began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter."
- Epstein "with the assistance of" Ms. Maxwell "converted [Ms. Giuffre] into . . . a 'sex slave.'" *Id*. Ms. Giuffre was a "sex slave" from "about 1999 through 2002."
- Ms. Maxwell also was a "co-conspirator in Epstein's sexual abuse."
- Ms. Maxwell "appreciated the immunity" she acquired under Epstein's plea agreement, because the immunity protected her from prosecution "for the crimes she committed in Florida."
- Ms. Maxwell "participat[ed] in the sexual abuse of [Ms. Giuffre] and others."
- Ms. Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [Ms. Giuffre]." *Id*. She shared the photos with Epstein.
- As part of her "role in Epstein's sexual abuse ring," Ms. Maxwell "connect[ed]" Epstein with "powerful individuals" so that Epstein could traffic Ms. Giuffre to these persons.
- Ms. Giuffre was "forced to have sexual relations" with Prince Andrew in
- "[Ms. Maxwell's] apartment" in London. Ms. Maxwell "facilitated" Ms. Giuffre's
- sex with Prince Andrew "by acting as a 'madame' for Epstein."
- Ms. Maxwell "assist[ed] in internationally trafficking" Ms. Giuffre and "numerous other young girls for sexual purposes."
- Ms. Giuffre was "forced" to watch Epstein, Ms. Maxwell and others "engage in illegal sexual acts with dozens of underage girls."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above. Ms. Giuffre contests the reference to "lurid details". Moreover, the testimony from numerous witnesses corroborates the statements Ms. Giuffre made in her joinder motion. *See* below.

- *See* McCawley Dec. at Exhibit 16, Sjoberg's May 18, 2016 Dep. Tr. at 8-9, 13, 33-35, 142-143
- *See* McCawley Dec. at Exhibit 4, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103
- *See* McCawley Dec. at Exhibit 14, Rinaldo Rizzo's June 10, 2016 Dep. Tr. at 52-60
- *See* McCawley Dec. at Exhibit 12, Lynn Miller's May 24, 2016 Dep. Tr. at 115
- *See* McCawley Dec. at Exhibit 13, Joseph Recarey's June 21, 2016 Dep. Tr. at 29-30

- *See* McCawley Dec. at Exhibit 15, David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36
- Exhibit 2 Excerpted Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589
- *See* McCawley Dec. at Exhibit 10, Marcinkova Dep. Tr. at 10:18-21; 12:11-15; etc.
- *See* McCawley Dec. at Exhibit 8, Kellen Dep. Tr. at 15:13-18; 20:12-16; etc. Epstein Dep. Tr. at 116:10-15; 117:18-118:10; etc.
- *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 28, 52-54
- *See* McCawley Dec. at Exhibit 30, U.S. Attorney Victim Notification Letter GIUFFRE002216-002218
- *See* McCawley Dec. at Exhibit 33, July 2001 New York Presbyterian Hospital Records GIUFFRE003258-003290
- J *See* McCawley Dec. at Exhibit 38, Judith Lightfoot psychological records GIUFFRE005431-005438
- *See* McCawley Dec. at Exhibit 28, Message Pad evidencing Defendant arranging to have underage girls and young women come to Epstein's home GIUFFRE001386-001571
- *See* McCawley Dec. at Exhibit 29, Black Book in which Defendant and other household staff maintained a roster of underage girls including [REDACTED] [REDACTED], who were minors at the time the Palm Beach Police's Investigation of Jeffrey Epstein GIUFFRE001573-00669
- *See* McCawley Dec. at Exhibit 40, Sex Slave books Epstein ordered from Amazon.com at GIUFFRE006581
- *See* McCawley Dec. at Exhibit 32, the folder Defendant sent to Thailand with Ms. Giuffre bearing Defendant's phone number GIUFFRE003191-003192

- *See* McCawley Dec. at Exhibit 39, the Palm Beach Police Report showing that Epstein used women and girls to collect underage girls for his abuse GIUFFRE005614-005700
- *See* McCawley Dec. at Exhibit 41, Epstein's Flight Logs showing that Defendant flew with Ms. Giuffre 23 times GIUFFRE007055-007161

DEFENDANT'S PURPORTED FACTS

12. In the joinder motion, Ms. Giuffre also alleged she was "forced" to have sex with Harvard law professor Alan Dershowitz, "model scout" Jean Luc Brunel, and "many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Response to Point #7 and 11, above.

DEFENDANT'S PURPORTED FACTS

13. Ms. Giuffre said after serving for four years as a "sex slave," she "managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed that Ms. Giuffre made this statement and has since discovered evidence that indicates she was mistaken on the exact timeframe of her abuse and was with Defendant and Jeffrey Epstein from the years 2000 – 2002.

DEFENDANT'S PURPORTED FACTS

14. Ms. Giuffre suggested the government was part of Epstein's "conspiracy" when it "secretly" negotiated a non-prosecution agreement with Epstein precluding federal prosecution of Epstein and his "co-conspirators." The government's secrecy, Ms. Giuffre alleged, was motivated by its fear that Ms. Giuffre would raise "powerful objections" to the agreement that would have "shed tremendous public light on Epstein and other powerful individuals.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not suggest that the Government was part of Epstein's conspiracy to commit sex offenses. The CVRA case deals with whether the Government failed in their responsibilities to the victims to inform the victims that the Government was working out a NPA,

and it is Ms. Giuffre's belief that the Government did fail to so inform the victims, and intentionally did not inform the victims because the expected serious objection from many of the victims might prevent the Government from finalizing a NPA with Epstein. *See* McCawley Dec. at Exhibit 50, Joinder Motion (GIUFFRE00319-00333).

DEFENDANT'S PURPORTED FACTS

15. Notably, the other "Jane Doe" who joined Ms. Giuffre's motion who alleged she was sexually abused "many occasions" by Epstein was unable to corroborate any of Ms. Giuffre's allegations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This is untrue. The other Jane Doe could corroborate many of Ms. Giuffre's allegations based on a similar pattern of abuse that she suffered by Epstein. She did not know Ms. Giuffre though. [REDACTED], who was deposed in this case, and who was a minor, corroborates the same pattern of abuse. *See* McCawley Dec. at Exhibit 7, [REDACTED] Dep. Tr. at 54:25-57:5.

DEFENDANT'S PURPORTED FACTS

16. Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, Ms. Giuffre told Ms. Churcher of virtually none of the details she described in the joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This is untrue. Furthermore, Defendant does not offer any citation or evidence on this point. Defendant's statement here is knowingly false. Having read the articles and taken Ms. Giuffre's deposition, Defendant knows that Ms. Giuffre did reveal details in 2011 consistent with those in the joinder motion. *See* McCawley Dec. at Exhibit 31, GIUFFRE003678, FBI Redacted 302, GIUFFRE001235-1246.

DEFENDANT'S PURPORTED FACTS

17. **Ms. Maxwell's response to Ms. Giuffre's "lurid" accusations: the January 2015 statement**. As Ms. Giuffre and her lawyers expected, before District Judge Marra in the

CVRA action could strike the "lurid details" of Ms. Giuffre's allegations in the joinder motion, members of the media obtained copies of the motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Response to Point #7, above.

DEFENDANT'S PURPORTED FACTS

18. At Mr. Barden's direction, on January 3, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing "a quotable statement on behalf of Ms. Maxwell." The email was sent to more than 6 and probably less than 30 media representatives. It was not sent to non-media representatives.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant falsely claims that "[a]t Mr. Barden's direction, on January 3, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing 'a quotable statement on behalf of Ms. Maxwell.'" This is a blatant falsehood about the document that is at the heart of this litigation. Record evidence shows that Gow sent that email at Defendant's direction, not at Mr. Barden's direction. Indeed, on the evening before his deposition, Mr. Gow produced an email exchange he had with Defendant in which Defendant directs Mr. Gow to send the press statement. It is as follows:

From: G Maxwell <GMax1@ellmax.com>
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow<ross@acuityreputation.com>
Cc: Philip Barden<philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

Jane Doe 3 is Virginia Roberts so not a new individual.

The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue.

The original allegations are not new and have been fully responded to and shown to be untrue

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschwitz is involved in having sexual relations with her, which he denies

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Chronologically, this email comes at the end of various other email exchanges between Defendant and Gow that discuss issuing a press release. The subject line of this email that Defendant wrote to Gow states "URGENT – this is the statement," thereby instructing Gow to release this statement to the press. Shortly after Defendant sent this email to Gow directing him to release the statement, Gow distributed the statement to multiple media outlets. Neither Defendant nor Gow have produced any email in which Barden directed Gow to issue this press release (nor can they).

Despite sending it herself, and despite it being responsive to six court-ordered search terms, Defendant failed to produce this email. Her press agent, Gow, produced this the evening before his deposition on November 17, 2016. At the deposition, Mr. Gow authenticated this email and confirmed that Defendant authorized the statement:

> Q. When you sent that email were you acting pursuant to Ms. Maxwell's retention of your services?
> A. Yes, I was.
> ***
> (Exhibit 9 was marked for identification.)
> Q. This also appears to be an email chain with you and Ms. Maxwell; is that correct?
> A. It does appear to be so.
> Q. Did you send the top email of the chain that says "Okay, G, going with this"?
> A. I did.
> Q. And did you receive from Ms. Maxwell, the bottom email of that chain?
> A. I believe so. Well, I believe -- yes, yeah, it was forwarded from Ms. Maxwell, yes.
> MR. DYER: Sorry, I don't quite understand that answer.
> THE WITNESS: I misspoke that. I did receive it from Ms. Maxwell.
> MR. DYER: Okay.
> Q. The subject line does have "FW" which to me indicates it's a forward. Do you know where the rest of this email chain is?
> A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, "Okay, Ghislaine, I'll go with this."
> It is my understanding that this is the agreed statement because the subject of the second one is "Urgent, this is the statement" so I take that as an instruction to send it out, as a positive command: "This is the statement."

See McCawley Decl. at Exhibit 6, November 18, 2016, Ross Gow Dep. Tr. at 14:15-17; 44:6-45:13.

Together, the email and Gow's testimony unequivocally establish that Defendant – not Barden – directed and "command[ed]" Gow to publish the defamatory statement. Accordingly, the first sentence of Defendant's Paragraph 18 is false.

The second sentence – "This email was sent to more than 6 and probably less than 30 media representatives" – omits the fact that not only did Gow admit to emailing the statement to the press, but he also read it to over 30 media representatives over the phone:

> Q. Do you recall ever reading the statement to the press or the media over the phone?
> A. It's very possible that I would have done so, yes.

See McCawley Decl. at Exhibit 6, Gow Dep. Tr. at 66:2-25.

> Q. Do you -- do you remember discussing that with The Guardian?
> A. No, I don't. I'm not saying I didn't but I can't recall. You have to bear in mind, if you'd be so kind, that I've been speaking to ***over 30 journalists*** and media outlets about this, and I can't recall every single -- the detail of every single conversation.

See McCawley Decl. at Exhibit 6, Gow Dep. Tr. at 64:8-14 (emphasis added). Thus, the second sentence of Defendant's Paragraph 18 is also false.

<u>DEFENDANT'S PURPORTED FACTS</u>

19. Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to Ms. Giuffre's allegations in the motion.

<u>MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS</u>

Ms. Giuffre agrees to the first sentence. The second sentence is a false. Accordingly, there is no record evidence that Gow (or anyone else) "selected" journalists "for a response," or that there was any selection process whatsoever. To the contrary, Gow testified that anyone who inquired received a reference to the January 2015 defamatory response:

Q. To the extent you can recall or could estimate, how many other emails do you believe you sent bearing that statement that's in Exhibit 2?

A. I really can't remember but certainly more than six and probably less than 30, somewhere in between. Any time there was an incoming query it was either dealt with on the telephone by referring them back to the two statements of March 2011 and January 2015 or someone would email them the statement. So ***no one was left unanswered***, broadly, is the -- is where we were. But I can't remember every single person we reached out to.

See McCawley Dec at Exhibit 6 Gow Dep. Tr. at 67:15-68:1 (emphasis added).

DEFENDANT'S PURPORTED FACTS

20. The email to the media members read:

To Whom It May Concern,

Please find attached a quotable statement on behalf of Ms. Maxwell.

No further communication will be provided by her on this matter.

Thanks for your understanding.

Best Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.

Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

While Defendant cropped the body text of the email that was sent to news media representatives, she completely omitted the headings and metadata. Ms. Giuffre has put an image of the email below in Ms. Giuffre's Paragraph. *See* GM_00068.

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

<u>DEFENDANT'S PURPORTED FACTS</u>

21. Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did not pass it through a public relations firm, such as Mr. Gow's firm, Acuity Reputation.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant states: "Mr. Barden, who prepared the statement, did not intend it as a traditional press release solely to dissemination information to the media." Ms. Giuffre contests this statement, and all statements regarding Mr. Barden's beliefs and purposes, and the like.

Further, as stated in detail in Ms. Giuffre's Opposition Defendant's Motion for Summary Judgment, this Court should not even consider the Barden Declaration. Additionally, there is absolutely no record evidence of Barden's intent and the Court should not consider it.

The next sentence states, "So he intentionally did not pass it [the press release] through a public relations firm, such as Mr. Gow's firm, Acuity Reputation." Again, there is zero record evidence to support any assertion of Barden's intent. To the extent that this sentence claims that Barden did not give the statement to Gow, Ms. Giuffre does not dispute it; as described above, Defendant gave the statement to Gow with instructions to publish it. *See* McCawley Dec. at Exhibit 48, RG(UK)_000009, imaged in full at paragraph 81, *supra*. To the extent that this sentence claims that the statement did not pass "through a public relations firm, such as Mr. Gow's firm, Acuity Reputation," Ms. Giuffre disputes that statement. Record documentary evidence and testimony establish that this statement was disseminated through a public relations firm, namely, Ross Gow's firm, Acuity Reputation. *See* McCawley Dec. at Exhibit 6, Gow Dep. Tr. at 109:4-6 ("Q. Approximately how long have you been providing such services? A. Acuity was set up in 2010.").

DEFENDANT'S PURPORTED FACTS

22. The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of Ms. Giuffre's false allegations. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject Ms. Giuffre's allegations to inquiry and scrutiny. For example, he noted in the statement that Ms. Giuffre's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicized as news."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre objects to this paragraph in its entirety. She disputes that the January 2015 statement "served two purposes," as this statement is wholly unsupported by the record, which Defendant again neglects to cite. Ms. Giuffre also contests the second sentence in which Defendant claims that "Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of Ms. Giuffre's false allegations." First, Ms. Giuffre disputes any statement of Barden's intent as explained above. Second, Ms. Giuffre disputes that there was any "republication" by the press as a matter of law, as explained in her memorandum of law opposing summary judgment, as the press did not "republish" the press statement under New York law. Third, Ms. Giuffre disputes that her allegations are "false," and cites to the following non-exhaustive sampling of evidence to corroborate her allegations against Defendant:

- *See* McCawley Dec. at Exhibit 16, Sjoberg's May 18, 2016 Dep. Tr. at 8-9, 13, 33-35, 142-143
- *See* McCawley Dec. at Exhibit 4, Figueroa June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103
- *See* McCawley Dec. at Exhibit 14, Rinaldo Rizzo's June 10, 2016 Dep. Tr. at 52-60
- *See* McCawley Dec. at Exhibit 12, Lynn Miller's May 24, 2016 Dep. Tr. at 115
- *See* McCawley Dec. at Exhibit 13, Joseph Recarey's June 21, 2016 Dep. Tr. at 29-30
- *See* McCawley Dec. at Exhibit 15, David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36

- Exhibit 2 Excerpted Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570 and 1589
- *See* McCawley Dec. at Exhibit 10, Marcinkova Dep. Tr. at 10:18-21; 12:11-15; etc.
- *See* McCawley Dec. at Exhibit 8, Kellen Dep. Tr. at 15:13-18; 20:12-16; etc. Epstein Dep. Tr. at 116:10-15; 117:18-118:10; etc.
- *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 28, 52-54
- *See* McCawley Dec. at Exhibit 42, Photographs including GIUFFRE007162-007182.
- *See* McCawley Dec. at Exhibit 30, U.S. Attorney Victim Notification Letter GIUFFRE002216-002218
- *See* McCawley Dec. at Exhibit 33, July 2001 New York Presbyterian Hospital Records GIUFFRE003258-003290
- *See* McCawley Dec. at Exhibit 38, Judith Lightfoot psychological records GIUFFRE005431-005438
- *See* McCawley Dec. at Exhibit 28, Message Pad evidencing Defendant arranging to have underage girls and young women come to Epstein's home GIUFFRE001386-001571
- *See* McCawley Dec. at Exhibit 29, Black Book in which Defendant and other household staff maintained a roster of underage girls including [REDACTED] [REDACTED], who were minors at the time the Palm Beach Police's Investigation of Jeffrey Epstein GIUFFRE001573-00669
- *See* McCawley Dec. at Exhibit 40, Sex Slave books Epstein ordered from Amazon.com at GIUFFRE006581
- *See* McCawley Dec. at Exhibit 32, the folder Defendant sent to Thailand with Ms. Giuffre bearing Defendant's phone number GIUFFRE003191-003192

- *See* McCawley Dec. at Exhibit 39, the Palm Beach Police Report showing that Epstein used women and girls to collect underage girls for his abuse GIUFFRE005614-005700
- *See* McCawley Dec. at Exhibit 41, Epstein's Flight Logs showing that Defendant flew with Ms. Giuffre 23 times GIUFFRE007055-007161

Next, Defendant states, "He [Barden] believed these ends could be accomplished by suggesting to the media that, among other things, they should subject Ms. Giuffre's allegations to inquiry and scrutiny." Ms. Giuffre disputes any statement as to Barden's "belief" (*supra*). Ms. Giuffre disputes that the harm to Defendant's reputation could be mitigated by the media's inquiry into and scrutiny of Ms. Giuffre's allegations, because a deeper inquiry would only reveal additional evidence corroborating Ms. Giuffre's allegations, such as the evidence put forth in Ms. Giuffre's opposition memorandum of law and detailed in the bulleted citations, *supra*.

Defendant then states, "For example, he [Barden] noted in the statement that Ms. Giuffre's allegations changed dramatically over time, suggesting that they are 'obvious lies' and therefore should not be 'publicized as news.'" First, Ms. Giuffre disputes that Barden noted anything in the statement, as that is unsubstantiated by the record evidence. Not to do Defendant's work for her, but the closest evidence Defendant has for such a statement is testimony from the Gow deposition wherein Gow speculates that Barden "had a hand in" drafting the press statement, an opinion which may or may not be based on first-hand knowledge. *See* McCawley Dec. at Exhibit 6, Gow Dep. Tr. at 45:14-17 (Q. Okay. A. And I say, "Thanks, Philip" because I'm aware of the fact that he had a hand, a considerable hand in the drafting.") This is wholly insufficient to show who drafted the passages quoted by Defendant above. Regardless of those passages' original author, it is ultimately Defendant who "noted" anything because it is her statement and she directed that it be sent to the media and public.

Second, Ms. Giuffre disputes that her allegations have changed over time, "dramatically" or otherwise. Third, Ms. Giuffre disputes that the press release "suggest[ed]" that her allegations are "obvious lies," because Defendant's press release affirmatively, unambiguously stated that her allegations are "obvious lies" – there is no subtlety, suggestion, or statement of opinion here. *See Giuffre v. Maxwell*, 165 F. Supp.3d 147, 152 (S.D.N.Y. 2016) (". . . these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion."

DEFENDANT'S PURPORTED FACTS

23. Second, Mr. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish Ms. Giuffre's allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that Ms. Giuffre's allegations were "defamatory." In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of Ms. Giuffre's obviously false allegations and the legal indefensibility of their own conduct.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This paragraph is another purported statement of Defendant's counsel's "intent." Defendant states: "Second, Mr. Barden intended the January 2015 statement to be a 'shot across the bow' of the media, which he believed had been unduly eager to publish Ms. Giuffre's' allegations without conducting any inquiry of their own." Not only does Defendant once again refer to Mr. Barden's intent, but she also mischaracterizes the statement as a "shot across the bow" of the media. The press release did not threaten or give warning to the media in any way whatsoever. *See* McCawley Dec. at Exhibit 26, GM_00068, full image copied in Ms. Giuffre's Paragraph 18, *supra*.

Next, Ms. Giuffre disputes the sentence, "Accordingly, in the statement he repeatedly noted that Ms. Giuffre's allegations were 'defamatory.'" Barden did not "note" anything in the statement, nor does Defendant cite to any record evidence that he does. Furthermore, Ms. Giuffre

denies that any of her allegations are defamatory in the slightest, as they are all true and substantiated by record evidence (*supra*).

Ms. Giuffre also disputes the sentence, "In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of Ms. Giuffre's obviously false allegations and the legal indefensibility of their own conduct." First, Ms. Giuffre objects to any statement of Barden's intent, as articulated above. Second, Defendant's conventional press release was in no way any type of "cease and desist letter." There is no record evidence in support of this claim, and Defendant unsurprisingly cites to none. Third, Ms. Giuffre disputes that any media-recipients would be given to understand "the seriousness with which Ms. Maxwell considered the publication of Ms. Giuffre's obviously false allegations and the legal indefensibility of their own conduct" by Defendant's self-serving press release, as that is unsupported by the record. Finally, Ms. Giuffre rejects that her allegations are "obviously false," a claim which is completely unsupported by record evidence.

DEFENDANT'S PURPORTED FACTS

24. Consistent with those two purposes, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a quotable statement on behalf of Ms. Maxwell" (emphasis supplied). The statement was intended to be a single, one-time-only, comprehensive response—quoted in full—to Ms. Giuffre's December 30, 2014, allegations that would give the media Ms. Maxwell's response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre disputes that any part of Defendant's press release is "consistent with those two [of Barden's] purposes." Indeed, Ms. Giuffre disputes this and any statement relating to Barden's "purposes," as explained above.

Next, Ms. Giuffre disputes that, "The statement was intended to be a single, one-time-only, comprehensive response – quoted in full – to Ms. Giuffre's December 30, 2014, allegations that would give the media Ms. Maxwell's response." First, Ms. Giuffre disputes this and any statement relating to Barden's "intent" as explained above. Second, Ms. Giuffre disputes that anyone intended the press release to be a one-time-only, comprehensive response. The record evidence says otherwise: Gow repeatedly issued this statement via email and over the phone for months on end.

Next, Defendant states, "The purpose of the prefatory statement was to inform the media-recipients of this intent." First, Ms. Giuffre disputes this and any statement relating to Barden's purpose as explained above. Second, Ms. Giuffre disputes that the press release was to inform the media of ***anything***. Defendant issued a press release, instructed them to publish it (by telling them it was "quotable"), *see* McCawley Dec. at Exhibit 48, RG(UK)_000009 (*supra*), and hired a press agent to feed it to the press:

> Q. Did Ms. Maxwell retain the services of you or your firm?
> A. Yes, she did.
> ***
> Q. Is it your belief that that agreement was in effect on January 2nd, 2015?
> A. Yes.
> Q. Do you recall the terms of that agreement?
> A. Well, it was a re-establishment of an existing agreement so if we go back to the original agreement, it was to provide public relations services to Ms. Maxwell in the matter of Giuffre and her activities.

See McCawley Dec. at Exhibit 6 Gow Dep. Tr. at 12:19-21; 13:9-16. The record evidence shows that Defendant's intent was for the press to publish her press release: any other interpretation is not only contrary to logic, but unsupported by the record.

DEFENDANT'S PURPORTED FACTS

25. **Ms. Giuffre's activities to bring light to the rights of victims of sexual abuse.** Ms. Giuffre has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed to the portion of Defendant's assertion in bold font. Ms. Giuffre has not engaged in activities to bring attention to herself, rather she has taken action to aid in the prosecution of her abusers, and she seeks to bring light to the rights of victims of sexual abuse.

DEFENDANT'S PURPORTED FACTS

26. Ms. Giuffre created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre created Victims Refuse Silence, Inc., in order to help other sexually trafficked victims find the resources they need to recover and heal. *See* **www.victimsrefusesilence.org.**

DEFENDANT'S PURPORTED FACTS

27. The "goal" of Victims Refuse Silence "was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse." Toward this end, Ms. Giuffre has "dedicated her professional life to helping victims of sex trafficking."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed.

DEFENDANT'S PURPORTED FACTS

28. Ms. Giuffre repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Denied. Ms. Giuffre was approached by numerous media outlets and refused to speak to most of them. Media organizations sought her out; she did not seek them out. *See* McCawley Dec. at Exhibit 35, GIUFFRE003690, email from Sharon Churcher seeking to interview Ms. Giuffre.

DEFENDANT'S PURPORTED FACTS

29. On December 30, 2014, Ms. Giuffre publicly filed an "entirely unnecessary" joinder motion laden with "unnecessary," "lurid details" about being "sexually abused" as a "minor victim[]" by wealthy and famous men and being "trafficked" all around the world as a "sex slave."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Paragraph 7, *supra*, listing multiple reasons why details were, in fact, necessary.

DEFENDANT'S PURPORTED FACTS

30. The Ms. Giuffre's alleged purpose in filing the joinder motion was to "vindicate" her rights under the CVRA, expose the government's "secretly negotiated" "non-prosecution agreement" with Epstein, "shed tremendous public light" on Epstein and "other powerful individuals" that would undermine the agreement, and support the CVRA Ms. Giuffre's' request for documents that would show how Epstein "used his powerful political and social connections to secure a favorable plea deal" and the government's "motive" to aid Epstein and his "co-conspirators."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Paragraph 7, *supra*, listing multiple purposes of Ms. Giuffre's lawyers' filing of the motion.

DEFENDANT'S PURPORTED FACTS

31. Ms. Giuffre has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein's alleged "sex scheme."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Paragraph 52, *infra*, explaining that the context of this statement is misleading.

DEFENDANT'S PURPORTED FACTS

32. **Republication alleged by Ms. Giuffre.** Ms. Giuffre was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were "'published globally, including within the Southern District of New York,'" as Ms. Giuffre alleged in Paragraph 9 of Count I of her complaint. In response, Ms. Giuffre identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre objects to this paragraph in its entirety, starting with the bolded heading ("Republication alleged by Ms. Giuffre"). There is no "republication" as a matter of law in this case, as explained in Ms. Giuffre's memorandum of law. Accordingly, Ms. Giuffre is not and has not alleged republication. As noted in her objection that, it is Defendant who possesses the knowledge as to where the defamatory statements were published; unsurprisingly, Defendant failed to comply with Ms. Giuffre's discovery requests on the same.

As Defendant already knows, Ms. Giuffre provided a sampling of Defendant's defamatory statements published by the news media, as "identification of an exhaustive responsive list would be unduly burdensome." This, of course, is because Defendant caused her statement to be published in an enormous number of media outlets. Ms. Giuffre's full response to Interrogatory No. 6 is below. As the Court can see, these nine instances were a good-faith effort to provide some samples (as it would be virtually impossible to provide all of them), below. Ms.

Giuffre has also put forth an exhaustive expert report and expert testimony from Jim Jansen regarding the dissemination of Defendant's defamatory press release.

> Ms. Giuffre objects because the information interrogatory above is in the possession of Defendant who has failed to comply with her production obligations in this matter, and has failed to comply with her production obligations with this very subject matter. See Document Request No. 17 from Ms. Giuffre's Second Request for Production of Documents to Defendant Ghislaine Maxwell. Maxwell has not produced all "URL or Internet addresses for any internet version of such publication" that she directed her agent, Ross Gow, to send.
>
> Ms. Giuffre further objects because the information requested above is in the possession of Defendant's agent, who caused the false statements to be issued to various media outlets. Ms. Giuffre has not had the opportunity to depose Maxwell's agent Ross Gow; therefore, this answer remains incomplete.
>
> Consequently, Ms. Giuffre reserves the right to modify and/or supplement her responses, as information is largely in the possession of the Defendant and her agent. Ms. Giuffre objects to this interrogatory in that it violates Rule 33 as its subparts, in combination with the other interrogatories, exceed the allowable twenty-five interrogatories. Ms. Giuffre objects to this request because it is in the public domain. Ms. Giuffre also objects in that it seeks information protected by the attorney-client/work product privilege, and any other applicable privilege stated in the General Objections.
>
> Notwithstanding such objections, Ms. Giuffre has already produced documents supplements such responsive documents with the following list of publications. While the identification of an exhaustive responsive list would be unduly burdensome, in an effort to make a good faith effort towards compliance, Ms. Giuffre provides the following examples, which are incomplete based on the aforementioned reasons:

Date	Nature	Publishing Entity	Statement/URL
January 2, 2015	Internet	Ross Gow	Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue. Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies. Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory. Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.
January 2, 2015	Internet	Bolton News	http://www.theboltonnews.co.uk/news/national/11700192.Palace_denies_Andrew_sex_case_claim/
January 3, 2015	Internet	Telegraph	http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html
January 3, 2015	Internet	Daily Mail	http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html
January 3, 2015	Internet	Huffington Post	http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims_n_6409508.html
January 4, 2015	Internet	Express	http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew
January 4, 2015	Internet	Jewish News Online	http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/
January 5, 2015	Internet/ Broadcast	NY Daily News	http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
January 5, 2015	Internet/ Broadcast	AOL UK	http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/

Two newest articles

[1] https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/

[2] http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971

DEFENDANT'S PURPORTED FACTS

33. In none of the nine instances was there any publication of the entire January 2015 statement.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

While there may be certain publications who did not print every word of Defendant's lengthy press release, most publications quoted the most salient, to-the-point parts of Defendant's statement that call Ms. Giuffre a liar. In each of the nine articles listed above, the defamatory statement, as articulated by the Complaint and *as identified by the Court as actionable*, is published. *See Giuffre v. Maxwell*, 165 F. Supp.3d 147, 152 (S.D.N.Y. 2016) ("statements that Giuffre's claims 'against [Defendant] are untrue,' have been 'shown to be untrue,' and are 'obvious lies' have a specific and readily understood factual meaning: that Giuffre is not telling the truth about her history of sexual abuse and Defendant's role, and that some verifiable investigation has occurred and come to a definitive conclusion proving that fact. Second, these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion"). Ms. Giuffre also put forth extensive evidence of the mass distribution of Defendant's defamatory statement to over 66 million viewers through her expert witness Jim Jansen. *See* McCawley Dec. at Exhibit 24, Expert Report of Jim Jansen.

DEFENDANT'S PURPORTED FACTS

34. Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in Ms. Giuffre's response to Interrogatory No. 6, in connection with the media's publication of portions of the January 2015 statement.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre disputes this statement in its entirety, as it is completely devoid of record evidence. In fact, the record establishes the contrary. First, Defendant hired Gow because his

position allowed him to influence the press to publish her defamatory statement. A sampling of Gow's testimony establishes just that:

> Q. Did Ms. Maxwell retain the services of you or your firm?
> A. Yes, she did.
>
> ***
>
> Q. Is it your belief that that agreement was in effect on January 2nd, 2015?
> A. Yes.
> Q. Do you recall the terms of that agreement?
> A. Well, it was a re-establishment of an existing agreement so if we go back to the original agreement, it was to provide public relations services to Ms. Maxwell in the matter of Giuffre and her activities.
>
> ***
>
> Q. You can answer -- to the extent that anything you testify to is not protected by a privilege.
>
> A. Ms. Roberts first came to my attention on or around March 2011 when I was called into a meeting with Philip Barden and Ms. Maxwell at Devonshires law office, that she had made -- Ms. Giuffre had made extremely unpleasant allegations about Ms. Maxwell's private life. We were -- Acuity Reputation, my firm was called in to protect Ms. Maxwell's reputation, and to set the record straight. That was -- and that work commenced on or around March of 2011.
>
> ***
>
> Q. Does this document fairly depict pages from your -- from Acuity Reputation's website?
> A. It does.
> Q. Do you see where it says "We manage reputation and forge opinion through public relations, strategic communications and high level networking"?
> A. I do.
> Q. Is that a true statement?
> A. Say it again. Sorry.
> Q. Is that a true statement?
> A. It is, yes. I wrote that statement.
>
> ***
>
> Q. Okay. Do you see where your website claims that your company has "excellent relationships with the media"?
> A. I do.
> Q. Is that a true statement?

A. That is true, yeah.

***

Q. Is it correct that you advertise your "excellent relationships with the media" because your services often include giving communications to the media on behalf of your clients?

A. Yes.

See McCawley Dec. at Exhibit 6 Gow Dep. Tr. at 13:9-16; 15:18-16:3; 109:12-22; 110:16-21; 111:3-7. In addition to testimonial evidence, the proof is also in the result. By using Gow to issue her press release, Defendant caused her statement to be published by numerous major news organizations with wide readership all over the globe. Accordingly, the record evidence shows that Ms. Maxwell, through her agent, had immense control and authority over the media, convincing major news outlets to publish her words based on nothing more than a single email from Gow.

DEFENDANT'S PURPORTED FACTS

35. Ms. Giuffre's defamation action against Ms. Maxwell. Eight years after Epstein's guilty plea, Ms. Giuffre brought this action, repeating many of the allegations she made in her CVRA joinder motion.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed, but noting that the defamation cause of action against Defendant did not accrue until Defendant defamed her in January of 2015, the same year Ms. Giuffre filed suit against Defendant for defamation.

DEFENDANT'S PURPORTED FACTS

36. The complaint alleged that the January 2015 statement "contained the following deliberate falsehoods":

(a) That Giuffre's sworn allegations "against Ghislaine Maxwell are untrue."
(b) That the allegations have been "shown to be untrue."
(c) That Giuffre's "claims are obvious lies."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Agreed. However, in discovery, Defendant was finally forced to produce the complete press release she issued. *See* McCawley Dec. at Exhibit 26, GIUFFRE00068.

DEFENDANT'S PURPORTED FACTS

37. Ms. Giuffre lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell. After leaving the Growing Together drug rehabilitation facility in 1999, Ms. Giuffre moved in with the family of a fellow patient. There she met, and became engaged to, her friend's brother, James Michael Austrich. She and Austrich thereafter rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. Later, they stayed briefly with Ms. Giuffre's parents in the Palm Beach/ Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. Although Ms. Giuffre agreed to marry Austrich, she never had any intention of doing so.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not voluntarily live independently from her parents with her fiancé, rather Ms. Giuffre was a troubled minor child who was not truly engaged prior to meeting Defendant and Epstein. Where Ms. Giuffre lived, and who she lived with, are not relevant to the issues being decided in this action. Again, this is merely a transparent distraction from the case that is actually at issue, and is being used for the sole purpose of inserting conjecture in an effort to distract the Court and ultimately the jury.

Although Austrich testified that he proposed to Ms. Giuffre on Valentine's Day, *see* Austrich at p. 19, Ms. Giuffre was a troubled teen who could not realistically be considered a fiancé in the true sense of the word, nor was she of legal age to marry. In fact, as accurately described by Defendant, Ms. Giuffre never had any intention of marrying Austrich. Giuffre Dep. Tr. at 127:22-128:21. Given that Ms. Giuffre was a child with limited legal capacity at this point, and that she did not have any intention of marrying Austrich, a reasonable person could not assert that Ms. Giuffre was engaged.

DEFENDANT'S PURPORTED FACTS

38. Ms. Giuffre re-enrolled in high school from June 21, 2000 until March 7, 2002. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, Ms. Giuffre re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. On September 20, 2001, Ms. Giuffre then enrolled at Royal Palm Beach High School. A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. Id. Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Ms. Giuffre remained enrolled at Survivor's Charter School until March 7, 2002. She was present 56 days and absent 13 days during her time there. Id. Ms. Giuffre never received her high school diploma or GED. Ms. Giuffre and Figueroa went "back to school" together at Survivor's Charter School. The school day there lasted from morning until early afternoon.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies this statement. Either Defendant is blatantly misleading this Court or Defendant simply does not understand how to interpret Ms. Giuffre's school records. The record produced by Defendant (GM0888) is specifically titled "A07. Assignment History," which reflects semester start and end dates per each 180 day school year, ***not*** dates that Ms. Giuffre physically enrolled or withdrew from school. *See* McCawley Dec. at Exhibit 27, GM0888.

PANEL: ___ A07. ASSIGNMENT HISTORY YEAR: 16
T234 Monday May 23, 2016 9:04 am
STDT: 12870606 ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A C	ENTRY CD	DATE	OD	WITHDRAWAL CD	DATE	P R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	E Y
_	R02	101201	_	W26	030702	N	_	02	01	_	3390	SURVIVORS	10	56	31	___	Y
_	R02	092001	_	W02	101101	N	_	02	01	_	2331	ROYAL PALM HIG	10	13	1	___	_
_	EA1	081401	_	W32	092001	Z	_	02	A1	_	2192	WLLNGTN HS ADL	30	___	___	___	_
_	EA1	081600	_	W47	081301	Z	_	01	A1	_	2192	WLLNGTN HS ADL	30	___	___	___	Y
_	EA1	062100	_	W47	081500	Z	_	00	A1	_	2192	WLLNGTN HS ADL	30	___	___	___	Y
_	E01	081699	_	W03	081699	N	_	00	01	_	2331	ROYAL PALM HIG	10	___	___	___	_
_	E01	081998	_	W02	060999	P	_	99	01	_	0581	FOREST HILL HI	09	155	25	___	Y
_	E01	082097	_	W01	061098	R	_	98	01	_	2331	ROYAL PALM HIG	09	147	33	___	Y
_	E01	082097	_	W22	082097	N	_	98	01	_	2191	WELLINGTON HIG	09	___	___	___	_
_	R03	040797	_	W02	061197	P	_	97	01	_	1691	CRESTWOOD MID	08	40	5	___	Y
_	E01	082294	_	DNE	082294	N	_	95	01	_	1703	ROYAL PINES SC	06	___	___	___	_
_	E01	082393	_	W02	061094	P	_	94	01	_	1901	LOXAHATCHEE EL	05	167	13	___	Y
_	E01	082592	_	W01	061193	P	_	93	01	_	1901	LOXAHATCHEE EL	04	176	4	___	Y

While "Grade 30" indicates adult education, Ms. Giuffre's attendance records indicate that she was ***not*** present in school between 6/21/00-09/20/01 (*see* withdrawal codes W32 and W47).

WITHDRAWAL CODES: ADULT STUDENTS

- **W26** - Any student who withdraws from school to enter the adult education program prior to completion of graduation requirements.
- **W32** - Any adult student who left the class/program to enter another training program.
- **W47** - Any adult student who is procedurally withdrawn at the end of the term or school year who will continue in the class/program the next term or school year.

http://www.fldoe.org/core/fileparse.php/8861/urlt/0094063-appendb.pdf

More importantly, Ms. Giuffre's school transcripts clearly indicate "NO COURSES TAKEN" for the 1999-2000 and 2000-2001 school years. (*See* McCawley Dec. at Exhibit 27, GM_00893.) Ms. Giuffre's attempt to work and resume school at Survivor's Charter School as a 10th grader in the 2001-2002 school year was limited to a portion of the school year (10/20/01-03/07/02), and further substantiates Ms. Giuffre's testimony that she attempted to get away from Epstein's abuse, along with the following testimony by Figueroa:

Q: Was there a period of time between 2001 and when she left in 2002 here she was not working for Jeffrey?
A: Yes.
Q: What period of time was that?
A: It was pretty much, like, when she was actually working as a server. Like, basically because we were trying to not have her go back there. Like, she did not want to go back there. And we were trying to just work without needing his money, you know."

See McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 92-93

Q: So the thing that Virginia was tired of …What was it that Virginia was trying to get away from and stop with respect to working at Jeffrey Epstein's house?
A: To stop being used and abused.

See McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 248

Even still, if the records are correct, which Ms. Giuffre does not concede, the records indicate that Ms. Giuffre's attendance was poor, with 69 days present and 32 days absent out of a required 180 day school year and that she was **not enrolled at the end of the school year** (emphasis added).

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1999-2000 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 2000-2001 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
YEAR: 2001-2002 GRADE LEVEL: 10

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	G R	A C	O N	CREDIT ATT.	/EARN
1	0500530	PERS,CAR,SCH DEV 4	EL		C	Z	N	0.50	0.50
1	1001440	BUS ENG I	EN	J	B	Z	N	0.50	0.50
1	1205370	CONSUMER MATH	MA	C	C	Z	N	0.50	0.50
1	8300310	WORKPLACE ESSENTIAL	VO		B	Z	N	0.50	0.50
1	8301610	WORK EXP 1	VO		F	Z	N	0.50	0.00
1	8301650	WORK EXP-OJT	VO		F	Z	N	1.00	0.00
		CREDIT, TERM:						3.50	2.00

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

2001-2002 ANNUAL DAYS-PRESENT: 69 ABSENT: 32
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

See McCawley Dec. at Exhibit 27, GM_00893.

Ms. Giuffre's obvious gap in her school attendance, her presence verified by Epstein's pilot on flight logs, and an abundence of witness testimony all corroborate her story that she was that Ms. Giuffre was flying domestic and internationally with Epstein at least 32 times between 12/11/00-07/28/01 and 06/21/02-08/21/02 (Defendant traveling with Ms. Giuffre on 23 of the flights). *See* McCawley Dec. at Exhibits 15 and 41, Pilot, David Rodgers' Dep. Tr. 96:12-166; Rodger's Dep. Ex. 1 (Ms. Giuffre flight dates: 12/11/00; 12/14/00 (GIUFFRE007095); 01/26/01; 01/27/01; 01/30/01 (GIUFFRE007096); 03/05/01: 03/06/01; 03/08/01 x's 2; 03/09/01; 03/11/01 x's 2 (GIUFFRE007097); 03/27/01; 03/29/01; 03/31/01 (GIUFFRE007098); 04/09/01 x's 2; 04/11/01; 04/16/01; 05/03/01; 05/05/01 (GIUFFRE007099); 05/14/01(GIUFFRE007100); 06/03/01 06/05/01; 07/04/01; 07/08/01; 07/11/01 (GIUFFRE007101); 07/16/01; 07/28/01; (GIUFFRE007102); 06/21/02 (GIUFFRE007111); 08/18/02; 08/21/02 (GIUFFRE007112); *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 104: 9-14 (Q: Do you know how long Virginia had been coming over to the house before she started traveling on an airplane with Ghislaine and Jeffrey? THE WITNESS: Not too long. I don't think it was too long after that); *See* McCawley Dec. at Exhibit 37, GIUFFRE004721 (passport application).

<u>DEFENDANT'S PURPORTED FACTS</u>

39. During the year 2000, Ms. Giuffre worked at numerous jobs. In 2000, while living with her fiancé, Ms. Giuffre held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. Her taxable earnings that year totaled nearly $9,000. Ms. Giuffre cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs.

<u>MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS</u>

Ms. Giuffre disputes this statement. During 2000, Ms. Giuffre shared an apartment with her then boyfriend, James Michael Austrich and his friend, Mario. *See* McCawley Dec. at Exhibit 2, Austrich Dep. Tr. at p. 92. Although Austrich testified that he proposed to Ms. Giuffre on Valentine's Day, *see* Austrich at p. 19, Ms. Giuffre was a troubled teen who could not realistically be considered a fiancé in the true sense of the word nor was she of legal age to marry. While Ms. Giuffre held various jobs in 2000, "[SSA] records do not show the exact date of employment (month and day) because [they] do not need this information to figure Social Security benefits." *See* McCawley Dec. at Exhibit 46, GIUFFRE009176).

The reason that Ms. Giuffre cannot recall two companies listed on her SSA records (Southeast Employee Management Company or Oasis Outsourcing) is simply because they were not her employers. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 470-472. Had Defendant bothered to run a simple google search, she could have ruled them out as being payroll and benefit administration companies. *See* http://www.oasisadvantage.com/west-palm-beach-peo; http://www.progressiveemployer.com/; http://www.businesswire.com/news/home/20060501006151/en/Progressive-Employer-Services-Purchases-Southeast-Employee-Management.

Ms. Giuffre has testified that she believes she worked at Taco Bell, at an aviary, then Mar-a-Lago (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at p. 53, 470). Austrich also testified that Ms. Giuffre worked with him at Taco Bell, as well as a pet store for "over a month" before working at Mar-a-Lago (*See* McCawley Dec. at Exhibit 5, Austrich Dep. Tr. at p. 16, 30, 98). Neither Taco Bell nor the pet store are listed on Ms. Giuffre's SSA records because they were most likely paid through payroll companies. *See* McCawley Dec. at Exhibit 46, GIUFFRE009178. Ms. Giuffre also testified that she volunteered at an aviary where they

eventually put her on their payroll, but paid her very little. Giuffre Dep. Tr. at p. 52; Aviculture Breeding and Research Center taxable earnings for 2000 is $99.48, *See* McCawley Dec. at Exhibit 46, GIUFFRE009178.

DEFENDANT'S PURPORTED FACTS

40. Ms. Giuffre's employment at the Mar-a-Lago spa began in fall 2000. Ms. Giuffre's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. Mr. Roberts worked there year-round for approximately 3 years. After working there for a period of time, Mr. Roberts became acquainted with the head of the spa area and recommended Ms. Giuffre for a job there. Mar-a-Lago closes every Mother's Day and reopens on November 1. Most of employees Mar-a-Lago, including all employees of the spa area such as "spa attendants," are "seasonal" and work only when the club is open, i.e., between November 1 and Mother's Day. Ms. Giuffre was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre disputes this statement. Defendant cannot simply infer Ms. Giuffre's employment history and claim it to be undisputed. The Mar-a-Lago Club produced 177 pages of records in response to Defendant's subpoena. However, not one page indicated Ms. Giuffre's actual dates of employment, nor whether she was a full-time or seasonal employee. In fact, the only significant record produced was a single, vague chart entry indicating that Ms. Giuffre was terminated in 2000. MAR-A-LAGO 0173, 0176.

TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4

MAR-A-LAGO 0173

Box #1	1998 terms
Box #2	1998 & 1999 terms
Box #3	1999 terms
Box #4	2000 terms
Box #5	2000 terms
Box #6	2001 terms

MAR-A-LAGO 0176

Job postings and job descriptions produced by Mar-a-Lago from 2002 and later are irrelevant to Ms. Giuffre's employment because they are from after she worked there. Ms. Giuffre testified that Mar-a-Lago was a summer job. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. 56, 550. In fact, her father, Sky Roberts, testified that he referred his daughter for employment, and she did not get the job through a posting (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72); he drove his daughter to and from work consistent with his full time schedule (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 74); he believes the spa – like the kitchen/dining room - was open to local guests in the summer (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. 138-139); and that his daughter was not attending school when she worked at Mar-a-Lago (*See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. 134). In addition, Juan Alessi testified that it was "Summer" when Defendant approached Ms. Giuffre at Mar-a-Lago because he specifically remembered "that day I was sweating like hell in the -- in the car, waiting for Ms. Maxwell to come out of the massage." *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 94:24-95:2.

DEFENDANT'S PURPORTED FACTS

41. **Ms. Giuffre represented herself as a masseuse for Jeffrey Epstein**. While working at the Mar-a-Lago spa and reading a library book about massage, Ms. Giuffre met Ms. Maxwell. Ms. Giuffre thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. Ms. Giuffre's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. Ms. Giuffre commenced employment as a traveling masseuse for Mr. Epstein. Ms. Giuffre was excited about her job as a masseuse, about traveling with him and about meeting famous people. Ms. Giuffre represented that she was employed as a masseuse beginning in January 2001. Ms. Giuffre never mentioned Ms. Maxwell to her then-fiancé, Austrich. Ms. Giuffre's father never met Ms. Maxwell.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre denies Defendant's false and factually unsupported narrative. In Florida, a person cannot work as a masseuse unless she is "at least 18 years of age or has received a high

school diploma or high school equivalency diploma." Fla. Stat. § 480.041. Ms. Giuffre was a minor child, under the age of 18, when she was working at Mar-a-Lago as a spa attendant. Giuffre Dep. Tr. at 61:9-61:24. She was approached by Defendant, who told her she could make money as a masseuse, a profession in which Ms. Giuffre had no experience. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12. (Sky Roberts, Ms. Giuffre father, verified Ms. Giuffre's account that Defendant recruited his daughter to "learn massage therapy." *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 80:7-19; 84:18 - 85:1).

Ms. Giuffre's father drove her to Jeffrey Epstein's house, the address of which was given to her by Defendant. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 117:20-118:1. Ms. Giuffre was lead into the house, and was instructed by Defendant on how to give a massage, during which Epstein and Defendant turned the massage into a sexual encounter, and offered Ms. Giuffre money and a better life to be compliant in the sexual demands of Defendant and Epstein. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18. The minor Ms. Giuffre then began travelling with Defendant and Epstein on private planes and servicing people sexually for money—working not as a legitimate masseuse, but in a position of sexual servitude. *See* McCawley Dec. at Exhibits 5, 1, Giuffre Dep. Tr. at 193:22-194:16; 201:24; 204:24:205:5; Alessi Dep. Tr. at 104:9-104:14.

Epstein's house manager, Juan Alessi, described Defendant's methodical routine of how she prepared a list of places ahead of time, then drove to each place for the purpose of recruiting girls to massage Epstein. *See* McCawley Dec. at Exhibit 18, Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213. Alessi also stated that on multiple occasions he drove Defendant to pre-planned places while she recruited girls for

massage. *Id.* He furthered testified that he witnessed Ms. Giuffre at Epstein's house on the very same day that he witnessed Defendant recruit Ms. Giuffre from Mar-a-Lago. *See* McCawley Dec. at Exhibit 18, Alessi Dep. Tr. at 96-98; GIUFFRE000102-103 at p. 48-49.

Johanna Sjoberg, through her sworn testimony, demonstrated that Defendant recruited her in a similar fashion by driving to the college campus where she attended school and approached her to work at Epstein's home answering phones. *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 8-9. Sjoberg testified that she answered phones for one day before Defendant propositioned her to rub feet for $100.00 an hour. *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 13. The following day, Sjoberg was paired with Defendant's assistant, Emmy Taylor, who provided her with massage training on Epstein. Sjoberg at 13-15. Ms. Giuffre's then-boyfriend, Austrich, testified that he could not recall the name of the person who recruited Ms. Giuffre. However, he did say that she was recruited by someone to work for Epstein as a massage therapist, but that Ms. Giuffre did not have any experience. *See* McCawley Dec. at Exhibit 2, Austrich Dep. Tr. at 34-35, 100-101, 127-128. Neither Ms. Giuffre nor Sjoberg were licensed or trained in massage, but were invited soon after being recruited to travel with Epstein on his private plane to massage him. *See* McCawley Dec. at Exhibit 16, Giuffre Dep. Tr. at 16-17; Sjoberg Dep. Tr. at 13-15; Austrich Dep. Tr. at 109-110; Alessi Dep. Tr. at 104.

DEFENDANT'S PURPORTED FACTS

42. **Ms. Giuffre resumed her relationship with convicted felon Anthony Figueroa**. In spring 2001, while living with Austrich, Ms. Giuffre lied to and cheated on him with her high school boyfriend, Anthony Figueroa. Ms. Giuffre and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with Ms. Giuffre. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Ms. Giuffre's presence punched Austrich in the face. Figueroa and Ms. Giuffre fled the scene before police arrived. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This entire statement is wholly irrelevant to the case being tried, and is improperly being inserted to tarnish the record. Ms. Giuffre's dating history as a young teen bears no relation to the allegations made within Ms. Giuffre's complaint against Defendant. As previously stated, Defendant is attempting to muddy the record with nonsensical teen drama in an effort to detract from her salacious sexual abuse of a minor child. Such statements bear no relation to the issues presented through her motion for summary judgment, and should be given weight reflecting the same. As specifically set forth in Ms. Giuffre's objections to designated testimony, the alleged information would be excluded by multiple rules of evidence, and contested by Ms. Giuffre. *See* McCawley Dec. at Exhibit 5, Virginia Dep. Tr., *passim*. Moreover, it was the Defendant who solicited Anthony Figueroa to recruit high school aged girls for Epstein. *See* McCawley Dec. at Exhibit 4 Figueroa Tr. at 200 and 228-229.

DEFENDANT'S PURPORTED FACTS

43. **Ms. Giuffre freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, Ms. Giuffre and Figueroa hosted a party with a number of guests. During the party, according to Ms. Giuffre, someone entered Ms. Giuffre's room and stole $500 from her shirt pocket. Ms. Giuffre contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, Ms. Giuffre contacted the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. Again, Ms. Giuffre met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave."

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This statement is misleading in several respects and irrelevant. The fact that Ms. Giuffre did contact police on two occasions for two specific purposes and did not take that opportunity to also inform the police of everything else that was going on in her life at the time is immaterial. Defendant implies that anytime someone calls the police for one thing they should tell the police

about every other crime regardless of the relevance to the crime to which the police responded and regardless to the threat to herself should she report on these powerful people. Moreover, as Professor Coonan explained:

> Popular understandings of the term "sex slave" might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the "invisible chains" of fraud and psychological coercion.

See McCawley Dec. at Exhibit 23, Coonan Expert Report at 20. Ms. Giuffre specifically testified that she was fearful of Defendant and Epstein, and, accordingly, she would not have reporter her abusers. She also knew that Epstein had control over the Palm Beach Police. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 240:3-241:2.

DEFENDANT'S PURPORTED FACTS

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Ms. Giuffre**. Flight logs maintained by Epstein's private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Ms. Giuffre, between August 2001 and September 2002. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Ms. Giuffre lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Ms. Giuffre. During this same period of time, Ms. Giuffre was employed at various jobs, enrolled in school, and living with her boyfriend.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

The flight logs produced in this matter provide substantive evidence of Ms. Giuffre's travel while in the control of Defendant and Epstein, but are clearly incomplete. Moreover, Ms. Giuffre also was flown by Defendant on commercial flights. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 155:5-11. Ms. Giuffre disputes Defendant's statement to the contrary, as reliance upon incomplete records to prove that Ms. Giuffre was not in fact in the presence of

Defendant and Epstein is insufficient. Ms. Giuffre incorporates additional details contained in Response #38 and #46 herein.

Ms. Giuffre's obvious gap in her school records, her presence verified by Epstein's pilot on flight logs, and witness testimony, corroborate her story that she was traveling with Defendant and Epstein. In fact, flight logs and pilot testimony clearly prove that Ms. Giuffre was flying domestic and internationally with Epstein at least 32 times between 12/11/00-07/28/01 and 06/21/02-08/21/02 (Defendant traveling with Ms. Giuffre on 23 of the flights).

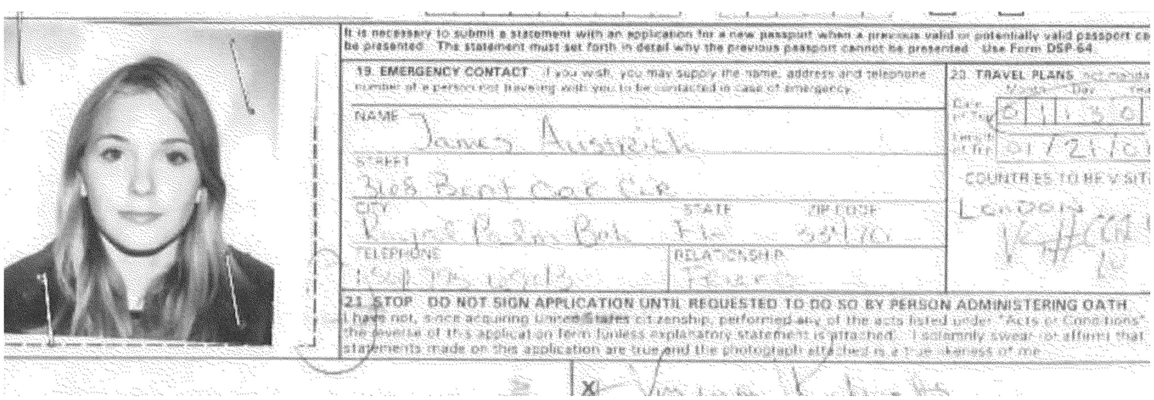
As Defendant acknowledges in her own statement #44, flight records are incomplete. There were several pilots and co-pilots that flew Epstein and Maxwell (Lawrence "Larry" Visoski, David (Dave) Rodgers, Bill Hammond, Pete Rathgeb, Gary Roxburgh, and Bill Murphy) in multiple aircrafts (JEGE, Inc. Aircraft # N908JE – Type B-727-31, and Hyperion Air, Inc. Aircraft # N909JE – Type G-1159B). Yet, only one pilot, David Rodger's produced flight records. See McCawley Dec. at Exhibit 41, David Rodger's Flight Log, GIUFFRE007055- GIUFFRE007161. In addition, many of the girls recruited by Defendant routinely traveled on commercial flights for the purposes of providing massages to Epstein or guests at Epstein's New York, New Mexico, or U.S. Virgin Island homes. *See* McCawley Dec. at Exhibit 16, Sjoberg Dep. Tr. at 27.

As thoroughly depicted below, Ms. Giuffre's passport application, travel records and witness testimony clearly demonstrate flight logs are incomplete because only one pilot kept a log, and Ms. Giuffre also flew commercially while she worked for Defendant and Epstein. For example, on December 11, 2000, while underage, Ms. Giuffre appears on Rodger's flight log (flight #1433) traveling with Epstein, Maxwell and Emmy Taylor from PBI (Palm Beach, FL) to TEB (Teterboro, NJ) then on December 14, 2001 (#1434) continues traveling with Epstein and

Maxwell to TIST (U.S. Virgin Islands); however, there is no flight records of Ms. Giuffre's return to Palm Beach. *See* McCawley Dec. at Exhibit 15, *see* McCawley Dec. at Exhibit 41, Rodger's Dep. Ex. 1 at GIUFFRE007095; see also Rodger's Dep. Tr. 96-98 ("Q: And do you know how Jeffrey Epstein, Ghislaine Maxwell, Adam Perry Lang, and Virginia get off of St. Thomas or leave the island? A: No. I do not. Probably a charter, I'm guessing.").

11	"	"	PBI	TEB		1433	JE, GM, ET, VIRGINIA
14	"	"	TEB	TIST		1434	JE, GM, AP, VIRGINIA
14	"	"	TIST	PBI		1435	REPOSITION FOR OPS 2 + TCAS
2001 JAN 13	"	"	PBI	PBI		1436	TCAS CERTIFICATION

On January 12, 2001, at Defendant's directive, Ms. Giuffre applied for a Passport to travel with them internationally. *See* McCawley Dec. at Exhibit 37, GIUFFRE004721, passport application listing travel plans to London; flight logs subsequently lists Ms. Giuffre traveling to London with Defendant, Epstein and others).


It is necessary to submit a statement with an application for a new passport when a previous valid or potentially valid passport cannot be presented. The statement must set forth in detail why the previous passport cannot be presented. Use Form DSP-64.

19. EMERGENCY CONTACT If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.

NAME James Austrich

STREET

CITY STATE ZIP CODE

TELEPHONE RELATIONSHIP

20. TRAVEL PLANS

COUNTRIES TO BE VISITED London

21. STOP DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH

I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form (unless explanatory statement is attached). I solemnly swear (or affirm) that the statements made on this application are true and the photograph attached is a true likeness of me.

On January 26, 2001, while underage, Ms. Giuffre appears on Rodger's flight log (flight #1444) traveling with Epstein, Maxwell and Emmy Taylor from TEB (Teterboro, NJ) to PBI (Palm Beach, FL); however, there is no flight record indicating how Ms. Giuffre got to New York. On January 27, 2001 (#1445) continues traveling with Epstein, Maxwell and Emmy Taylor from PBI (Palm Beach) to TIST (U.S. Virgin Islands) returning from TIST (U.S. Virgin

Islands) four days later on January 30, 2001. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007096; Rodger's Dep. Tr. at 100-102.

26	"	"	TCB	PBI		1444	JG, GM, ET, VIRGINIA ROBERTS
18	C172	N1446V	~~PBI~~ LNA	~~PBI~~ LNA			C172 VOUT PETE SORENSON
18	"	"	LNA	LCQ			B727 CLOSING N505LS
19	"	"	LCQ	MCO			JONATHAN MAND – INSTRUMENT COMPETENCY CHECK – SATISFACTORY
19	"	"	MCO	LNA			
22	G1159B	N908JE	PBI	TIST		1445	JG, GM, ET, VIRGINIA ROBERTS
30	"	"	TIST	PBI		1446	JG, GM, ET, VIRGINIA ROBERTS

On March 5, 2001 Ms. Giuffre, Maxwell, Epstein, Emmy Taylor traveled together internationally (flight #1464) leaving PBI (West Palm Beach) to CYJT (Stephenville, Canada); then on March 6, 2001 (#1465) they continued on to LFPB (Paris, France) with a layover for three days. On March 8, 2001, other passengers, including one unidentified female, joined them on flights # 1466-1467 (from LFPB (Paris, France) - LGGR (Granada, Spain) eventually landing in EGGW (London, England) on March 11, 2001, where she was then introduced to and lent out to Prince Andrew. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007097; Rodger's Dep. Tr. at 104-114.

2001			From	To	Flown	No.	Maneuvers, Endorsements
21	B-727-200	~~[illegible]~~	DFW	DFW			RUNWAY STABILIZING, MANUAL GEAR EXTENSION/LANDING, FUEL DUMPING, RTO BRAKE COOLING, BATTERY SS
22	"	SIMULATOR	MGM	MGM			STEEP TURNS, STALLS, SINGLE ENGINE GO-AROUND 1 + 2 ENGINE APPROACHES, RTO, STARTING MAL.
23	"	"	"	"			B727 CHECK RIDE
23	C-421B	N908GM	DFW	ADS			JONATHAN MAND – HIGH DENSITY AIRPORT OPERATIONS
23	"	"	ADS	PNS			JONATHAN MAND – SID, ICING OPERATIONS, FUEL MANAGEMENT, PERFORMANCE CHARTS
23	"	"	PNS	PBI			JONATHAN MAND – LOST COMMUNICATIONS PROCEDURES, WEIGHT & BALANCE
MAR 3	"	"	PBI	LCQ			KRISTY RODGERS – CLIMBS, DESCENTS, STRAIGHT + LEVEL FLIGHT
3	"	"	LCQ	LAL			KRISTY RODGERS – TURNS, STRAIGHT + LEVEL
3	"	"	LAL	PBI			KRISTY RODGERS – DESCENTS, S + L
5	G-1159B	N909JE	PBI	CYJT		1464	JG, GM, ET, VIRGINIA ROBERTS GARY ROXBURGH
6	"	"	CYJT	LFPB		1465	JG, GM, ET, VR GARY ROXBURGH
8	"	"	LFPB	LEGR		1466	JG, GM, ET, VR, ALBERTO + LINDA PINTO, 1 FEMALE, RICARDO LEGORRETA FC?
8	"	"	LEGR	GMTT		1467	JG, GM, ET, VR, ALBERTO + LINDA PINTO 1 FEMALE
9	"	"	GMTT	EGGW		1468	JG, GM, ET, VR RGR
11	"	"	EGGW	BGR		1469	JG, GM, ET, VR RGR
11	"	"	BGR	TEB		1470	JG, GM, ET, VR RGR

See also photo of Ms. Giuffre, Maxwell and Prince Andrew in London. GIUFFRE007167; *see also* Figueroa Dep. Tr. at 251.



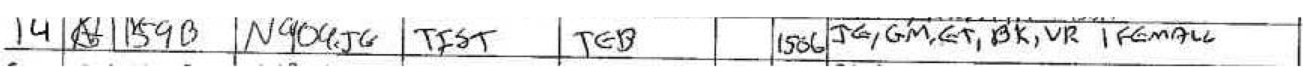
Ms. Giuffre, Epstein, Maxwell, and Taylor remained in London for three days until departing on March 11, 2001 (#1469), stopping in BGR (Bangor, Maine) before departing (#1470) back to TEB (Teterboro, NJ); however, there is no flight record of Ms. Giuffre's return to Palm Beach. *See* Rodger's Dep. Ex. 1 at GIUFFRE007097; Rodger's Dep. Tr. at 104-114.

							[illegible] MISCOMMUNICATIONS.
27	G-1159B	N909JE	PBI	TEB		1478	JE, GM, ET, VR, 2 FEMALES, BANU RGR KULIK KULU
29	"	"	TEB	SAF		1479	JE, GM, AP, VR, BK, MARVIN MINSKY HENRY JARECKI
31	"	"	SAF	PBI		1480	JE, GM, AP, VR, NADIA BJORLEN, HENRY JARECKI, MARVIN MINSKY
APR 1	"	"	PBI	LCQ		1481	JE, GM, AP

On March 27, 2001, while underage, Ms. Giuffre, Maxwell, Epstein, Emmy Taylor, two <u>unidentified</u> females and others traveled together (#1478) from PBI (Palm Beach) to TEB (Teterboro, NJ); then three days later, on March 29, 2001, continued on (#1479) to SAF (Santa Fe, NM), returning to PBI (Palm Beach, FL) with Nadia Bjorlin (#1480) on March 31, 2001. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007098; Rodger's Dep. Tr. at 119-125.

A few glaring examples of how Ms. Giuffre's travel records are incomplete is that Ms. Giuffre traveled from ADS (Addison, Texas) on May 3, 2001 (#1501) to SAT (San Antonio, Texas); then departs SAT (San Antonio, Texas) on May 5, 2001 (#1502) to PBF (Pine Bluff, AR) but there is no record produced that explains how Ms. Giuffre arrived in Addison, Texas or how she returned to Palm Beach from Pine Bluff, AR. Although Epstein's plane appears to have to originated from Palm Beach on April 23, 2001, Ms. Giuffre's name doesn't not appear on the log. *See* Rodger's Dep. Ex. 1 at GIUFFRE007099; Rodger's Dep. Tr. at 130-132 ("Q: Do you know how Virginia Roberts got to Addison, Texas? A: No. … Q: Went to Addison and picked up Virginia Roberts? A: It looks like it.").

Another prime example of how incomplete Ms. Giuffre's travel records are is on on May 14, 2001. While Ms. Giuffre appears on flight #1506 with Epstein, Maxwell, Emmy Taylor and others (including one unidentified female) from TIST (U.S. Virgin Islands) to TEB (Teterboro, NJ), there is no record produced explaining how Ms. Giuffre arrived to the U.S. Virgin Islands or where she stayed when she landed in New York. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007100; Rodger's Dep. Tr. at 132-133 ("Q: What were the other possible avenues back in those days for Jeffrey Epstein, Ghislaine Maxwell to travel to the Virgin Islands? A: They could have done a charter, possibly.") (*Id.* at 134-135 "Q: All right. So at some point in time, between May 7th and May 14th – A: Uh-huh. Q: -- somebody flies the Gulfstream to the Virgin Islands. A: Correct. Q: And who would that be? A: Larry Visoski and I don't know who the other person would have been."); *Id.* at 136 ("Q. Do you know where Virginia Roberts went during that time after she landed in Teterboro on the 14th? A. I do not.")



14	1590	N908JE	TIST	TEB		1506	JE, GM, ET, BK, VR	1 FEMALE

On June 3, 2001, Ms. Giuffre travels from PBI (Palm Beach) to TIST (U.S. Virgin Islands) on flight #1510 for three days; then, on June 5, 2001, continues on flight #1511 to TEB (Teterboro, NJ); however, there is no record of Ms. Giuffre returning to Palm Beach. *See* Rodger's Dep. Ex. 1 at GIUFFRE007101; Rodger's Dep. Tr. at 136-137.

JUN 6-1	G-1159B	N909JE	TEB	PBI		1509	JE, GM, ET, AP, BANU KUCUKKOYLU	✓
3	"	"	PBI	TIST		1510	JE, VIRGINIA ROBERTS, BANU KUCUKKOYLU	✓
5	"	"	TIST	TEB		1511	JE, VR, BK	✓
8	"	"	TEB	CYUL		1512	JE, GM, NAOMI CAMPBELL, REBECCA WIDJSTG, ANDRE LAVALLEE, ANNA MALOVA, DAVID COHEN	✓
12	"	"	CYUL	TEB		1513	REPOSITION (AP BLEED AIR DUCT)	✓
12	"	"	TEB	PBI		1514	JE	✓
13	"	"	PBI	TEB		1515	JE, CAROL	✓
15	"	"	TEB	PBI		1516	JE, GM, SHERIDAN, CAROLYN, 1 FEMALE	
18	"	"	PBI	TEB		1517	JE, GM, 1 FEMALE	✓
22	"	"	TEB	LFPO		1518	JEFFREY, GM, CRISTALLE WASCHE, EKATERINA GRINEVA	✓
23	"	"	LFPO	LFMN		1519	JE, GM, 1 FEMALE	✓
25	"	"	LFMN	LIML		1520	JE, GM, 1 FEMALE	✓
26	"	"	LFML	LFPB		1521	JE, GM	✓
28	"	"	LFPB	LPAZ		1522	JE, GM, ET, ED TUTTLE	✓
28	"	"	LPAZ	TIST		1523	JE, GM, ET, ED TUTTLE	
JUL 4	"	"	TIST	PBI		1524	JE, AP, VR, 1 FEMALE	✓
8	"	"	PBI	TEB		1525	JE, GM, ET, AP, VR, SHERIDAN GIBSON BUTTE, 1 FEMALE, GARY ROXBURGH	✓
11	"	"	TEB	CPS		1526	JE, GM, ET, VR, GARY ROXBURGH	

Then, on July 4, 2001, Ms. Giuffre reappears on flight #1524 with Epstein and an unidentified female leaving TIST (U.S. Virgin Islands) to return to PBI (Palm Beach); however, there is no flight record that reflects how Ms. Giuffre got to the U.S. Virgin Islands. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007101; Rodger's Dep. Tr. at 138-139 ("Q. And do you know how Virginia Roberts got to the Virgin Islands? A: No. Q. Is there any -- is it possible that the Cessna took her or the Boeing took her? Or any other aircraft that is owned by Jeffrey? A: No, I would -- if I had to guess, I would guess the airlines.")

Again, on July 8, 2001, Ms. Giuffre appears on flight #1525 with Epstein, Maxwell, Emmy Taylor and others including an unidentified female departing PBI (Palm Beach) to TEB

(Teteboro, NJ). Four days later, on July 11, 2001, Ms. Giuffre, Epstein and Maxwell continue on (#1526) to CPS (Cahokia-St. Louis, Illinois) which was a stop due to a mechanical delay on the way to Sante Fe, NM; however, there is no flight record that reflects how Ms. Giuffre returned home to Palm Beach. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007101; Rodger's Dep. Tr. 139-141 ("Q: And then three days later, you leave out of Teterboro to CPS? A: Yes. Q: Where is that? A: That is St. Louis, actually it is Cahokia, Illinois, across the river from St. Louis. Q. Who are your passengers? A. Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Virginia Roberts. We were actually en route to Santa Fe. We had a mechanical problem. We had to go into there for maintenance.")

On July 16, 2001, Ms. Giuffre appears on flight #1528 with Epstein, Maxwell and Emmy Taylor from SAF (Santa Fe, NM) to TEB (Teteboro, NJ); however, Ms. Giuffre's flight to Santa Fe, NM is missing from the records. In addition, on July 28, 2001, Ms. Giuffre reappears on the flight log (#1531) returning with Epstein from TIST (U.S. Virgin Islands) to PBI (Palm Beach); however, there is no record of Ms. Giuffre's flight to the U.S. Virgin Islands. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007102; Rodger's Dep. Tr.142.

2001			From	To			
JUL 16	G-1159B	N909JE	CPS	SAF		1527	REPOSITION. PITOT STATIC LEAK GARY ROXBURGH
16	"	"	SAF	TEB		1528	JE, ET, GM, VR GARY ROXBURGH
23	"	"	PBI	TIST		152[illegible]	JE, SHELLEY LEWIS
28	"	"	TIST	PBI		1531	JE, VIRGINIA ROBERTS

On June 21, 2002, Ms. Giuffre appears on flight #1570 with Epstein, Maxwell, Sarah Kellen, Cindy Lopez and Jean Luc Brunel from PBI (Palm Beach, FL) to MYEF (George Town, Bahamas); however, there is no record of Ms. Giuffre returning to Palm Beach. *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007111; Rodger's Dep. Tr. 161-162 ("Q:

Virginia Roberts was taken to the Bahamas. Do you know where she went from there? A. I do not.")

2002			From	To	Flight	No.	Maneuvers, Endorsements
JUN 8	B-727-31H	N908JE	EIDW	JFK		111	JE, GM, SK
8	"	"	JFK	PBI		112	JE, SK
12	G-1159B	N909JE	PBI	PBI		1567	GMU FLIGHTS – SEAN RILEY, GREG CARPENTER
14	B-727-31H	N908JE	PBI	BOS		113	REPOSITION
14	"	"	BOS	TIST		114	JE, SK, CINDY LOPEZ, LAURA HAYES
16	"	"	TIST	JFK		115	JE, GM, SK, CINDY LOPEZ, LAURA HAYES
19	G-1159B	N909JE	PBI	TEB		1568	REPOSITION PETE RATHGEB
19	"	"	TEB	PBI		1569	JE, GM, SK, CINDY LOPEZ PETE RATHGEB
21	"	"	PBI	MYEF		1570	JE, GM, SK, CL, JEAN LUC BRUNEL, VIRGINIA ROBERTS PETE RATHGEB
21	"	"	MYEF	PBI		1571	REPOSITION PETE RATHGEB
23	"	"	PBI	MYEF		1572	REPOSITION PETE RATHGEB
23	"	"	MYEF	TEB		1573	JE, GM, SK, CL, JULIANA BORGES, JEAN LUC BRUNEL / MELISSA STARK PETE RATHGEB
23	"	"	TEB	PBI		1574	REPOSITION PETE RATHGEB
AUG 4	G-1159B	N909JE	PBI	MVY		1583	JE, 1 FEMALE
4	"	"	MVY	BED		1584	JE, 1 FEMALE
4	"	"	BED	TEB		1585	JE, 1 FEMALE
5	"	"	TEB	SAF		1586	JE, SK, 2 FEMALES
6	C-172XP	N739SP	AEG	AEG			172 CHECK OUT
6	206L3	N474AW	ZORRO	AEG			
15	B-727-31H	N908JE	JAX	JAX		126	C-CHECK FLIGHT TEST PETE RATHGEB
16	"	"	JAX	PBI		127	RETURN FROM C-CHECK PETE RATHGEB
17	G-1159-B	N909JE	SAF	TEB		1589	JE, GM, SK, CINDY LOPEZ, VIRGINIA ROBERTS, KELLEN, EDWARDO, ALFREDO, MARGARITA, MELK SANTOS
18	"	"	TEB	PBI		1590	JE VIRGINIA ROBERTS, 1 FEMALE

On August 17, 2002, Ms. Giuffre appears on flight #1589 with Epstein, Maxwell, Sarah Kellen, Cindy Lopez and others from SAF (Santa Fe, NM) to TEB (Teterboro, NJ); Ms. Giuffre returns to PBI (Palm Beach, FL) on August 18, 2002 with Epstein and one unidentified female (#1590). *See* McCawley Dec. at Exhibit 15, Rodger's Dep. Ex. 1 at GIUFFRE007112; Rodger's Dep. Tr. 165 ("Q: Do you know how Virginia Roberts got to Santa Fe? A: No.")

From September 29, 2002 through October 19, 2002, Defendant and Epstein sent Ms. Giuffre on a commercial flight to Thailand for massage training and provided her with all accommodations. *See* McCawley Dec. at Exhibit 43, Giuffre007411-Giuffre007432.

DEFENDANT'S PURPORTED FACTS

45. **Ms. Giuffre and Figueroa shared a vehicle during 2001 and 2002**. Ms. Giuffre and Figueroa shared a '93 white Pontiac in 2001 and 2002. Ms. Giuffre freely traveled around the Palm Beach area in that vehicle. In August 2002, Ms. Giuffre acquired a Dodge Dakota pickup truck from her father. Figueroa used that vehicle in a series of crimes before and after Ms. Giuffre left for Thailand.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre and Tony Figueroa did not share a vehicle during 2001 and 2002. Instead, Figueroa borrowed Ms. Giuffre's car while she was traveling with Defendant and Epstein. Figueroa testified that he "got to take the car, because she was going somewhere else in the world and did not need it, so…" Figueroa Dep. Tr. At 89-90.

In fact, Ms. Giuffre was frequently traveling with Defendant and Epstein. *See* McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 9-14 (stating that Virginia started traveling on an airplane with Ghislaine and Jeffrey "not too long" after she started going over to the house). Figueroa further testified that Virginia "would normally go about two weeks out of every month" with Epstein. Figueroa Dep. Tr. at 90. He further stated, "Pretty much every time I took her there, it was always to his mansion. I picked her up one time -- maybe it was a couple of times --from the jet stream place. But pretty much every single time it was at the hou- -- at the mansion." *Id.* Moreover, Ms. Giuffre testified she purchased a car from the $10,000 payment she received from Epstein after she was forced to have sex with Prince Andres in London at Defendant's home when Ms. Giuffre was a minor. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 120:1-20.

DEFENDANT'S PURPORTED FACTS

46. **Ms. Giuffre held a number of jobs in 2001 and 2002**. During 2001 and 2002, Ms. Giuffre was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM).

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This statement is laughable. Ms. Giuffre was hardly gainfully employed during a time period in which she was trying to escape from the grip Epstein and Maxwell had on Ms. Giuffre. While Social Security provides that she earned nominal amounts of earning statements for 2001 and 2002, the records do not indicate the month or quarter of the year's work. *See* McCawley Dec. at Exhibit 46, GIUFFRE009176. For a brief period, Ms. Giuffre attempted to go back to school to earn her GED, and tried unsuccessfully to hold down waitressing jobs. *See* McCawley Dec. at Exhibit 27, GIUFFRE009179.

For example, in 2001, Ms. Giuffre earned $212.00 as a waitress working "briefly" at Mannino's Restaurant. (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 472). In 2002, Ms. Giuffre earned $403.64 at CCI of Royal Palm Beach working there (TGI Fridays) for a "short time period." (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 473). Then, Ms. Giuffre worked at Roadhouse grill until about March 2002 earning $1,247.90 (*See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 474).

EMPLOYER NUMBER: 65-0241353
MANNINOS INC
MANNINOS RESTAURANT
12793 B W FOREST HILL BLVD
WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					$212.00

EMPLOYER NUMBER: 06-1587035
CCI OF ROYAL PALM INC
% ROBERT FURR TTEE
2255 GLADES RD STE 337-W
BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$403.64

EMPLOYER NUMBER: 65-0367604
ROADHOUSE GRILL INC
ROBERT C FURR TTEE IN BANKRUPTCY
2255 GLADES RD STE 337W
BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$1,247.90

EMPLOYER NUMBER: 65-0915938
MARC PINKWASSER DVM PA
13860 WELLINGTON TRCE STE 31
WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$1,561.75

GIUFFRE009179.

According to Dr. Pinkwasser's records, Ms. Giuffre's also received payroll checks for weeks ending 04/22/02-06/04/02 earning a total of $1,561.75. (*See* McCawley Dec. at Exhibit 47, GIUFFRE009203).

4/22/02	Courtyard Animal Hospital
5/6/02	Courtyard Animal Hospital
5/6/02	Courtyard Animal Hospital
5/20/02	Courtyard Animal Hospital
6/4/02	Courtyard Animal Hospital

Not long after Ms. Giuffre losing her job at Courtyard Animal Hospital, GIUFFRE00009211, flight records show that Ms. Giuffre was soon back under Epstein's control traveling with Maxwell to the Bahamas, Santa Fe, New Mexico then New York, *see* McCawley Dec. at Exhibit 47, GIUFFRE007111-GIUFFRE007112.

DEFENDANT'S PURPORTED FACTS

47. **In September 2002, Ms. Giuffre traveled to Thailand to receive massage training and while there, met her future husband and eloped with him**. Ms. Giuffre traveled

to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of $4,000. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did travel to Thailand to receive massage training in September 2002. However, Defendant has inaccurately told only part of the story. Defendant has conveniently left out certain key facts, which includes the fact that Ms. Giuffre was given an assignment from Defendant and Epstein that she had to recruit another underage girl from Thailand, and bring that young girl back to Epstein. *See* McCawley Dec. at Exhibit 43, GIUFFRE 003191. The document Ms. Giuffre was give directs her to "call Ms. Maxwell." *See* McCawley Dec. at Exhibit 32, GIUFFRE003191. It is not disputed by Defendant or Epstein, that Ms. Giuffre was expected to return to Epstein and Maxwell upon completion of her massage training and assignment. It is undisputed by Ms. Giuffre that she did not return to Defendant and Epstein, but instead escaped clear across the world to Australia where she remained in hiding from Defendant and Epstein for several years.

DEFENDANT'S PURPORTED FACTS

48. **Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography**. Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. That investigation commenced in 2005. Recarey worked only on the Epstein case for an entire year. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. Detective Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. Maxwell was not

> seen coming or going from the house during the law enforcement surveillance of Epstein's home. The arrest warrant did not mention Ms. Maxwell and her name was never mentioned before the grand jury. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. Detective Recarey also has no knowledge of Ms. Giuffre's conduct that is subject of this lawsuit.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

This statement is false. Detective Recarey knew that Maxwell was involved in the illegal sexual activities at Epstein's house. He wanted to speak to her, but Maxwell did not return his calls. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 28:23-29:10. Detective Recarey concluded that Defendant's role was to procure girls for Epstein. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 29:16-29:20. In the execution of the search warrant, stationary was found in the home bearing Maxwell's name, and notes were written by house staff to Maxwell. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 45:13-25; *Id.* at 83:3-83:15; see also Message Pads, GIUFFRE 001412, 001418, 001435, 001446, 001449, 001453, 001454. A key piece of evidence in the investigation were message pads uncovered in trash pulls, and from inside the residence during the search warrant. Those message pads revealed numerous calls left at the house for Maxwell, indicating she was staying in the house during the days when Epstein was engaging in illegal sex acts with minors.

Additionally, a walk through video taken during the execution of the search warrant revealed photos of topless females at the home, and there was even a photograph of Maxwell naked hanging in the home. The house staff who were deposed in the civil cases each testified to Maxwell being the boss in charge of everyone in the house. *See* McCawley Dec. at Exhibits 1,

19, 21, Banasiak Dep. Tr. at 8:21-9:16; 14:20-15:6; Alessi Dep. Tr. at 23:11-23:20; Rodriguez Dep. Tr. at 169:1-169:4.

Rodriguez, the house butler from 2004 through 2005, a time period that revealed daily sexual abuse of underage females, testified that Maxwell kept a list of the local girls who were giving massages at her desk, and that Maxwell kept nude photos of girls on her computer. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 238:4-238:22; 302:19-303:10; 306:1-306:24. Recarey testified that when the search warrant was executed, the house had been sanitized and the computers removed from the home. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 72:25-73:15. Banaziak testified that the computers were removed by Adriana Ross, another employee who answered to Maxwell. *See* McCawley Dec. at Exhibit 19, Banaziak Dep. Tr. at 54:7-22.

The record is replete with testimony demonstrating that Maxwell recruited Virginia, and recruited other females, who in turn recruited other females, all who were sexually abuse by Epstein; meaning, it is undisputed that Maxwell started the top of the pyramid of local Palm Beach girls who were all eventually identified as victims. *See, e.g.*, McCawley Dec. at Exhibit 1, Alessi Dep. Tr. at 34:19-35:3; 98:5-98:12; 104:15-104:23. The co-conspirator who maintained direct contact with the many underage victims was Sarah Kellen, whose sole responsibility was to schedule underage girls to visit Epstein for sex. Sarah reported directly to Maxwell. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 26:10-26:20. On the day when the search warrant was executed, the house maid, Ruboyo was scheduled to report to the house that day at 8 am; however, she received a call from Maxwell telling her not to go. *See* McCawley Dec. at Exhibit 20, Rabuyo Dep. Tr. at 81:20-82:25. Maxwell orchestrated and ran the entire sex

trafficking scheme from a high level, and insulated herself from most of the underage girls who were being paid for sex.

Tony Figueroa, Ms. Giuffre's ex-boyfriend, did testify that Maxwell personally requested that he find and bring girls to Epstein for sex once Ms. Giuffre had escaped, and that when he brought the girls Maxwell interacted with them. *See* McCawley Dec. at Exhibit 4, Figueroa Dep. Tr. at 200:6-18; 228:23-229:21. Rodriguez testified unequivocally that Maxwell was "the boss" and that she knew everything that was going on. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. 169:1-169:4.

<u>DEFENDANT'S PURPORTED FACTS</u>

49. **No nude photograph of Ms. Giuffre was displayed in Epstein's home**. Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia Roberts in Mr. Epstein's house." Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office.

<u>MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS</u>

This is false. Nude photographs were displayed throughout Epstein's home. Furthermore, Alfredo Rodriguez testified to Maxwell having pornography on her computer. Rodriguez Dep. Tr. 150:10-17; 306:1-306:24. He also testified to there being a collage of nude photos in Epstein's closet. *Id.* 253:14-254:18. That collage was eventually taken into evidence by Detective Recarey, who testified to that fact in his deposition. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 73:19-73:24. And those photos are still in the possession of the FBI or US Attorney's Office. *See* McCawley Dec. at Exhibit 13, Recarey Dep. Tr. at 74:2-74:7.

Numerous other people have testified about nude photographs being on display in the home including Ronaldo Rizzo, who visited the home on numerous occasions and who was reprimanded by Maxwell herself for looking at the nude photos. *See* McCawley Dec. at Exhibit 14, Rizzo Dep. Tr. at 25:19-26:20. Additionally, the search warrant video, taken at a time when

the house had already been sanitized, revealed photographs of nudity displayed, including a photograph of Maxwell herself in the nude. *See* McCawley Dec. at Exhibit 44, Search Warrant Video attached to the Deposition of Recarey.

Johanna Sjorberg testified that the Defendant bought her a camera for the specific purpose of her taking nude photos of herself. *See* McCawley Dec. at Exhibit 16 Sjoberg Tr. at 150. Finally, Virginia Giuffre testified that there was a nude photograph of her at the house. *See* McCawley Dec. at Exhibit 5 Virginia Giuffre Tr. at 232 and 333.

<u>DEFENDANT'S PURPORTED FACTS</u>

50. **Ms. Giuffre intentionally destroyed her "journal" and "dream journal" regarding her "memories" of this case in 2013 while represented by counsel**. Ms. Giuffre drafted a "journal" describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. *Id*. Ms. Giuffre also kept a "dream journal" regarding her thoughts and memories that she possessed in January 2016. To date, Ms. Giuffre cannot locate the "dream journal."

<u>MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS</u>

The dream journal contained memories of Ms. Giuffre's dreams. While Ms. Giuffre has looked for this journal, which is wholly irrelevant to this case, she has been unable to locate it. Ms. Giuffre also wrote in a personal journal some of her experiences with Maxwell and Epstein, which were harmful and painful. In an effort to relieve herself of those past painful experiences, Ms. Giuffre followed the advice of a therapist, and burned the journal as a form of cathartic release at a time when she was under no obligation to maintain the personal memorialization of personal and painful experiences. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 205:13-206:10.

DEFENDANT'S PURPORTED FACTS

51. **Ms. Giuffre publicly peddled her story beginning in 2011**. Ms. Giuffre granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with Ms. Giuffre and her "attorneys or other agents" from "early 2011" to "the present day." Ms. Giuffre received approximately $160,000 for her stories and pictures that were published by many news organizations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant's statement misrepresents history. In 2011, Ms. Giuffre was still in hiding from Epstein and Maxwell in Australia. Ms. Giuffre was not looking to sell anything or even speak with anyone about what had happened to her in her previous life from which she dramatically escaped. Journalist, Sharon Churcher, located Ms. Giuffre and impressed the importance of Ms. Giuffre standing up to those who had harmed her and speak with Federal authorities, which Ms. Giuffre did in 2011. *See* McCawley Dec. at Exhibit 31, Redacted 302 GIUFFRE001235-01246.

In addition, Churcher impressed the importance of bringing the abuse of Defendant and Epstein to public light to prevent their continued abuse of others. *See* McCawley Dec. at Exhibit 35, Giuffre003690. After much deliberation, Ms. Giuffre agreed to be interviewed by Churcher, and was compensated for sharing her story, which came at a heavy price of being publicly scrutinized.

DEFENDANT'S PURPORTED FACTS

52. **Ms. Giuffre drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish**. In 2011, contemporaneous with her Churcher interviews, Ms. Giuffre drafted a book manuscript which purported to document Ms. Giuffre's experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Ms. Giuffre communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Defendant's characterization of these activities are out of context and thus misleading. In 2008, Ms. Giuffre received a Victim Notification Letter from the United States Attorney's office for the Southern District of Florida, *see* McCawley Dec. at Exhibit 30, GIUFFRE0010202, regarding her sexual victimization by Epstein. Thereafter, in 2011, she sought psychological counseling from a psychologist for the trauma she endured. Also that year, journalist Sharon Churcher sought her out, and traveled half way around the globe to interview her on painful subjects. Ms. Giuffre was interviewed by the FBI in 2011. *See* McCawley Dec. at Exhibit 31, FBI Redacted 302 GIUFFRE01235-1246. She was also getting psychological help. *See* McCawley Dec. at Exhibit 38, Lightfoot Records, GIUFFRE005431-005438. In that situation, Ms. Giuffre began to draft a fictionalized account of what happened to her. It was against this backdrop of her trauma being unearthed, her steps to seek psychological counseling for it, that she drafted this manuscript. Doing so was an act of empowerment and a way of reframing and taking control over the narrative of her past abuse that haunts her.

"Writing 'I' has been an emancipatory project for women." Perreault, Jeanne, "AUTOGRAPHY/ TRANSFORMATION/ ASYMMETRY," *Women, Autobiography, Theory A Reader edited by Sidonie Smith & Julia Watson.* Indeed, scholars have written that the act of engaging in autobiography or even accounts loosely based on autobiography, is a process of taking control of one's own narrative and one's own self: "Thus a specific recitation of identity involves the inclusion of certain identity contents and the exclusion of others; the incorporation of certain narrative itineraries and internationalities, the silencing of others; the adoption of certain autobiographical voices, the muting of others." Smith, Sidonie, PERFORMATIVITY,

AUTOBIOGRAPHICAL PRACTICE, RESISTANCE, *Women, Autobiography, Theory A Reader edited by Sidonie Smith & Julia Watson.*

Indeed, even a cursory look at the manuscript penned by Ms. Giuffre informs the reader that she is trying to put forth a more palatable and more empowering narrative to over-write that powerlessness she felt when being abused by Defendant and Epstein. While Ms. Giuffre explored trying to publish her story to empower other individuals who were subject to abuse, she ultimately decided not to publish it. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. 249:16-18; 250:19-251:3.

DEFENDANT'S PURPORTED FACTS

53. **Ms. Giuffre's publicly filed "lurid" CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz**. On December 30, 2014, Ms. Giuffre, through counsel, publicly filed a joinder motion that contained her "lurid allegations" about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a "corrected" motion and two further declarations in January and February 2015, which repeated many of Ms. Giuffre's claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between Ms. Giuffre's lawyers, Edwards and Cassell, and Alan Dershowitz. After Ms. Giuffre publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called Ms. Giuffre a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

See Ms. Giuffre's Paragraph 7, *supra*, explaining why the allegations were necessary and appropriate for multiple reasons. Ms. Giuffre disputes Defendant's false characterization of these events, and, indeed, the media attention was caused by Defendant's issuing her defamatory press release.

DEFENDANT'S PURPORTED FACTS

54. **Ms. Giuffre formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy**. In 2014, Ms. Giuffre, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to Ms. Giuffre, the purpose of the organization is to promote Ms. Giuffre's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Ms. Giuffre attempts to promote Victims Refuse Silence at every opportunity. For example, Ms. Giuffre participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

MS. GIUFFRE'S STATEMENT CONTROVERTING DEFENDANT'S FACTS

Ms. Giuffre did not form the non-profit Victims Refuse Silence to "speak out on a public controversy," but instead to simply help survivors of sexual abuse and sexual trafficking. In order to provide assistance to victims, Ms. Giuffre attempted to talk about the non-profit's mission when she had the opportunity to do so. *See* www.victimsrefusesilece.org.

MS. GIUFFRE'S STATEMENT OF UNDISPUTED FACTS

55. Virginia Roberts was born August 9, 1983. *See* McCawley Dec. at Exhibit 51, Driver's License GIUFFRE009209.

56. Virginia Roberts turned 18 on August 9, 2001.

57. In 2000, Virginia's father Sky Roberts worked at the Mar-a-Lago. *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72, 74.

58. Sky Roberts got Virginia a job at Mar-a-Lago in 2000, either months before or just after Virginia's 17th birthday. *See* McCawley Dec. at Exhibit 17, Sky Roberts Dep. Tr. at 72, 74; Giuffre Dep. Tr. at 25:19-25:21; 28:10-28:12.

59. The only year in which Virginia was employed at Mar-a-Lago was 2000. *See* McCawley Dec. at Exhibit 49, MAR-A-LAGO 0173, 0176.

60. Virginia worked at Mar-a-Lago as a spa bathroom attendant. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 61:9-61:24; Austrich Dep. Tr. at 100:3-12.

61. Virginia was not a masseuse at Mar-a-Lago as she had no massage experience. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12; Austrich Dep. Tr. at 34-35, 100-101, 127-128; Figueroa Dep. Tr. at 82:10-15; 168:24-169:1; Sky Roberts Dep. Tr. at 80:7-19; 84:18 -85:1.

62. Maxwell approached Virginia at Mar-a-Lago, and recruited her to come to Jeffrey Epstein's house. *See* McCawley Dec. at Exhibits 1, 5, and 17, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12; Alessi Dep. Tr. at 94:24-95:2; Sky Roberts Dep. Tr. at 80:7-19; 84:18 -85:1.

63. At the time Maxwell recruited Virginia to Jeffrey Epstein's house, Virginia was either 16 or 17 years old, depending on whether this occurred just before or just after Virginia's birthday. *See* McCawley Dec. at Exhibit 49, MAR-A-LAGO 0173, 0176.

64. Virginia followed Maxwell's instructions and reported to Jeffrey Epstein's house on the night of the day when Maxwell approached Virginia at Mar-a-Lago. *See* McCawley Dec. at Exhibits 5 and 18, Giuffre Dep. Tr. at 117:20-118:1; Alessi Dep. Tr. at 96-98; GIUFFRE000102-103 at p. 48-49.

65. Maxwell told Virginia at Mar-a-Lago that Virginia could get paid for giving a massage to Jeffrey Epstein. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 111:12-111:21; 116:19-117:12.

66. When Virginia arrived at Epstein's house, she was taken upstairs to Epstein's bedroom, and instructed by Maxwell and Epstein how to give Epstein a massage. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18; Epstein Dep. Tr. at 74:3-14.

67. Epstein and Maxwell turned the massage into a sexual encounter. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18.

68. Virginia was not a professional masseuse, and was not old enough to be a masseuse in Florida even though Maxwell testified she only hired professional masseuses. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 61:9-61:24, 111:12-111:21, 116:19-117:12; Fla. Stat. § 480.041; Maxwell Dep. Tr. at 23:21-24:9; 31:6-18; 41:7-13; 220:13-221:2; 225:23-226:20; 248:5-16; 310:6-17; 383:2-18.

69. Maxwell and Epstein promised Virginia money and a better life in exchange for complying with their sexual demands. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 198:20-199:3; 199:15-199:18.

70. Maxwell had sex with Virginia and other females. *See* McCawley Dec. at Exhibit 5, Giuffre Dep. Tr. at 138:17-139:16; Maxwell 07-22-2016 Dep. Tr. at 86:25-87:9; 91:15-91:21.

71. Virginia was trafficked nationally and internationally for sexual purposes. *See* McCawley Dec. at Exhibits 5, 1, 41? GIUFFRE007055-007161 (Flight Logs); Giuffre Dep. Tr. at 193:22-194:16; 201:24; 204:24:205:5; Alessi Dep. Tr. at 104:9-104:14; Andrew Photo GIUFFRE007167; Spain Photo GIUFFRE007166.

72. Maxwell recruited other non-professionals under the guise of being a masseuse, but in reality only recruited girls for sexual purposes. *See* McCawley Dec. at Exhibits 5, 16, 4, 1, 18 Giuffre Dep. Tr. at 198:20-199:3; Sjoberg Dep. Tr. at 13-15; Figueroa Dep. Tr. at 88:12-22; Alessi Dep. Tr. at 34; GIUFFRE000105 at 57-58; GIUFFRE000241-242 at p. 212-213.

73. Maxwell was the boss of others whose job it was to recruit minor females for Epstein for sex, such as Sarah Kellen. *See* McCawley Dec. at Exhibit 21, Rodriguez Dep. Tr. at 26:10-26:20.

74. Maxwell was a recruiter of underage girls and other young females for Epstein for sex, and was the boss in charge of those females. *See* McCawley Dec. at Exhibits 16, 4, 21, and 1, Sjoberg Dep. Tr. 8-9, 13-15, 27; Figueroa Dep. Figueroa Dep. Tr. at 200:6-18; 228:23-229:21; Rodriguez Dep. Tr. 169:1-169:4; Alessi Dep. Tr. at 23:11-23:20; 34:19-35:3; 98:5-98:12; 104:15-104:23.

Dated: January 31, 2017

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 31, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served this day on the individuals identified below via transmission of Notices of Electronic Filing generated by CM/ECF.

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/s/ Sigrid S. McCawley
Sigrid S. McCawley

United States District Court
Southern District of New York

Virginia L. Giuffre,

Plaintiff, Case No.: 15-cv-07433-RWS

v.

Ghislaine Maxwell,

Defendant.

______________________________/

DECLARATION OF SIGRID MCCAWLEY IN SUPPORT OF PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT AND UNDISPUTED FACTS

I, Sigrid McCawley, declare that the below is true and correct to the best of my knowledge as follows:

1. I am a Partner with the law firm of Boies, Schiller & Flexner LLP and duly licensed to practice in Florida and before this Court pursuant to this Court's Order granting my Application to Appear Pro Hac Vice.

2. I respectfully submit this Declaration in Support of Plaintiff's Response to Defendant's Motion for Summary Judgment and Undisputed Facts.

3. Attached hereto as Sealed Exhibit 1 are true and correct copies of Excerpts from June 1, 2016 Depositions of Juan Alessi.

4. Attached here to as Sealed Exhibit 2 is a true and correct copy of Excerpts from June 23, 2016, Deposition of James Austrich.

5. Attached hereto as Sealed Exhibit 3 is a true and correct copy of Excerpts from September 9, 2016, Deposition of Jeffrey Epstein.

6. Attached hereto as Sealed Exhibit 4 is a true and correct copy of Excerpts from June 24, 2016, Deposition of Tony Figueroa (Volumes I and II).

7. Attached hereto as Sealed Composite Exhibit 5 are true and correct copies of Excerpts from May 3, 2016 and November 14, 2016, Deposition of Virginia Giuffre.

8. Attached hereto as Sealed Exhibit 6 is a true and correct copy of Excerpts from November 18, 2016, Deposition of Ross Gow.

9. Attached hereto as Sealed Exhibit 7 is a true and correct copy of Excerpts from June 20, 2016, Deposition of [redacted].

10. Attached hereto as Sealed Exhibit 8 is a true and correct copy of Excerpts from January 25, 2017, Deposition of Sarah Kellen.

11. Attached hereto as Sealed Exhibit 9 is a true and correct copy of Excerpts from November 29, 2016, Deposition of Peter Kent.

12. Attached hereto as Sealed Exhibit 10 is a true and correct copy of Excerpts from January 17, 2017, Deposition of Nadia Marcinko.

13. Attached hereto as Sealed Composite Exhibit 11 are true and correct copies of Excerpts from April 22, 2016 and July 22, 2016, Depositions of Ghislaine Maxwell.

14. Attached hereto as Sealed Exhibit 12 is a true and correct copy of Excerpts from May 24, 2016, Deposition of Lynne Trudy Miller

15. Attached hereto as Sealed Exhibit 13 is a true and correct copy of Excerpts from June 21, 2016, Deposition Joseph Recarey.

16. Attached hereto as Sealed Exhibit 14 is a true and correct copy of Excerpts from June 10, 2016, Deposition of Rinaldo Rizzo.

17. Attached hereto as Sealed Exhibit 15 is a true and correct copy of Excerpts from June 3, 2016, Deposition of David Rodgers.

18. Attached hereto as Sealed Exhibit 16 is a true and correct copy of Excerpts from May 18, 2016, Deposition of Johanna Sjoberg.

19. Attached hereto as Sealed Exhibit 17 is a true and correct copy of Excerpts from May 20, 2016, Deposition of Sky Roberts.

20. Attached hereto as Sealed Composite Exhibit 18 are true and correct copies of Excerpts from September 8, 2009, Depositions of Juan Alessi (GIUFFRE000102-000103; GIUFFRE000105; GIUFFRE000241-000242).

21. Attached hereto as Sealed Exhibit 19 is a true and correct copy of Excerpts from February 16, 2010, Deposition of Janusz Banasiak (GIUFFRE004431-004432; GIUFFRE004437-004438; GIUFFRE004477).

22. Attached hereto as Sealed Exhibit 20 is a true and correct copy of Excerpts from October 20, 2009, Deposition of Louella Rabuyo (GIUFFRE004386).

23. Attached hereto as Sealed Composite Exhibit 21 is a true and correct copy of Excerpts from July 29, 2009 and August 7, 2009, Deposition of Alfredo Rodriguez (GIUFFRE000936-000937; GIUFFRE000942; GIUFFRE000953-000954; GIUFFRE000974; GIUFFRE000978; GIUFFRE000996; GIUFFRE000999-001000; GIUFFRE001003).

24. Attached hereto as Sealed Exhibit 22 is a true and correct copy of August 1, 2016, Defendant's Privilege Log.

25. Attached hereto as Sealed Exhibit 23 is a true and correct copy of September 15, 2016, Expert Report of Professor Terry Coonan.

26. Attached hereto as Sealed Exhibit 24 is a true and correct copy of September 15, 2016, Expert Report of Doctor Bernard Jansen.

27. Attached hereto as Sealed Exhibit 25 is a true and correct copy of November 28, 2016, Expert Report of Peter Kent

28. Attached hereto as Sealed Exhibit 26 is a true and correct copy of January 2, 2015, Email Correspondence (GM_00068).

29. Attached hereto as Sealed Exhibit 27 is a true and correct copy of Excerpts of Palm Beach School County Records (GM_00888-00898).

30. Attached hereto as Sealed Exhibit 28 is a true and correct copy of Excerpts of Message Pads (GIUFFRE001388; GIUFFRE001409; GIUFFRE001412-4213; GIUFFRE001417-18, GIUFFRE001421; GIUFFRE001423; GIUFFRE001426-1428; GIUFFRE001432-1433; GIUFFRE001435; GIUFFRE001446; GIUFFRE001448-1449; GIUFFRE001452-1454; GIUFFRE001456; GIUFFRE001462; GIUFFRE001474; GIUFFRE001563).

31. Attached here to as Sealed Exhibit 29 is a true and correct copy of Epstein's Black Book (GIUFFRE001573-GIUFFRE001669).

32. Attached hereto as Sealed Exhibit 30 is a true and correct copy of September 3, 2008, U.S. Attorney Victim Notification Letter (GIUFFRE002216-002218).

33. Attached hereto as Sealed Exhibit 31 is a true and correct copy of July 5, 2013, Federal Bureau of Investigation Interview (GIUFFRE001235-001246).

34. Attached hereto as Sealed Exhibit 32 is a true and correct copy of Handwritten Note from Defendant. (GIUFFRE003191-003192).

35. Attached hereto as Sealed Exhibit 33 is a true and correct copy of July 2001 New York Presbyterian Hospital Records (GIUFFRE003258-003290).

36. Attached hereto as Sealed Exhibit 34 is a true and correct copy of a February 17, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003678).

37. Attached hereto as Sealed Exhibit 35 is a true and correct copy of February 13, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003690).

38. Attached hereto as Sealed Exhibit 36 is a true and correct copy of February 25, 2011, Email Correspondence to Sharon Churcher (GIUFFRE003731).)

39. Attached hereto as Exhibit 37 is a true and correct copy of a Passport Application

(GIUFFRE004721).

40. Attached hereto as Sealed Exhibit 38 is a true and correct copy of Judith Lightfoot Psychological Records (GIUFFRE005431-005438).

41. Attached hereto as Sealed Exhibit 39 is a true and correct copy of July 25, 2006, Palm Beach Police Department Incident Report (GIUFFRE005614-005700).

42. Attached hereto as Sealed Exhibit 40 is a true and correct copy of an Amazon Receipt (GIUFFRE006581).

43. Attached hereto as Sealed Exhibit 41 is a true and correct copy of David Rodger's June 3, 2016, Deposition Exhibit 1, Flight Log, (GIUFFRE007055-007161).

44. Attached hereto as Sealed Exhibit 42 are true and correct copies of Photographs (GIUFFRE007162-7182).

45. Attached hereto as Sealed Exhibit 43 is a true and correct copy of Travel Documents to Thailand (GIUFFRE007411-GIUFFRE007432).

46. Attached hereto as Sealed Exhibit 44 is a true and correct copy of Walkthrough Video CD (GIUFFRE007584).

47. Attached hereto as Sealed Exhibit 45 is a true and correct copy of West Palm Beach Contact List (GIUFFRE007834-GIUFFRE007847).

48. Attached hereto as Sealed Exhibit 46 is a true and correct copy of October 23, 2016, Social Security Administration records (GIUFFRE009176-GIUFFRE009179).

49. Attached hereto as Sealed Exhibit 47 is a true and correct copy of November 7, 2016, Employment Records from Courtyard Animal Hospital (GIUFFRE009203).

50. Attached hereto as Sealed Exhibit 48 is a true and correct copy of January 2, 2015, Email Correspondence (RG (UK) _000009).

51. Attached hereto as Sealed Exhibit 49 are true and correct copies of Termination

Documents (MAR-A-LAGO 0173 & MAR-A-LAGO 0176).

52. Attached hereto as Sealed Exhibit 50 is a true and correct copy of January 2, 2015, Joinder Motion (GIUFFRE000319-000333).

53. Attached hereto as Sealed Exhibit 51 is a true and correeect copy of Virginia Roberts Driver License (GIUFFRE009209).

I declare under penalty of perjury that the foregoing is true and correct.

/s/ Sigrid McCawley_______________
Sigrid McCawley, Esq.

Dated: January 31, 2017.

Respectfully Submitted,

BOIES, SCHILLER & FLEXNER LLP

By: /s/ Sigrid McCawley

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 31st day of January, 2017, I electronically filed the foregoing document with the Clerk of Court by using the CM/ECF system. I also certify that the foregoing document is being served to all parties of record via transmission of the Electronic Court Filing System generated by CM/ECF.

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/s/ Sigrid McCawley
Sigrid McCawley

EXHIBIT 1

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

--x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

June 1, 2016
9:12 a.m.

C O N F I D E N T I A L

Deposition of JOHN ALESSI, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOHN ALESSI
2 Q. You're ready to start, correct?
3 A. Yes.
4 Q. Can you tell us your current address?
5 A. [redacted] Boynton Beach,
6 Florida 33472.
7 Q. And your date of birth?
8 A. [redacted].
9 Q. And was there a time when you worked for a
10 man named Jeffrey Epstein?
11 A. Yes.
12 Q. And can you tell us when you began working
13 for Mr. Epstein?
14 A. I began working for Mr. Epstein part-time.
15 I cannot exactly tell you the date, but it was
16 1990/'91, probably. I worked a total of 13 years
17 for him.
18 Q. Okay. So you began in 1990 part-time,
19 correct?
20 A. Right.
21 Q. And you stopped working for him when?
22 A. I stopped working for him on
23 December 31st, 2001. I was out -- yes, 2001.
24 Q. Okay.
25 A. The end of 2001. I left the last day of

1 JOHN ALESSI

2 the year.

3 Q. Okay. I know that it's been a long time.

4 A. It's been a long time.

5 Q. I know. So I'm going to ask that you

6 refer to the statement that you provided to the

7 police November 21st, 2005, and please go to page 5.

8 I just want you to start reading at line 2 and 3,

9 and tell me if that refreshes your recollection as

10 to your time or duration of employment.

11 A. You're right. It was 2002, then. 2002.

12 Q. So sometime in 1990, you were a part-time

13 employee?

14 A. Uh-huh.

15 Q. And you worked until December 31st, 2002;

16 is that right?

17 A. Yes.

18 Q. Okay. And is it also correct that you

19 began full-time employment with Mr. Epstein on

20 January 1st, 1991, as stated in that report?

21 A. Yes.

22 Q. Prior to 1990, who did you work for?

23 A. Prior to 1990, I had a company, a

24 maintenance company, myself, my own company, Alessi

25 Maintenance. And before that, I worked for another

1 JOHN ALESSI
2 family, the Radi family in Palm Beach.
3 Q. Did you ever work for a man named Les
4 Wexner?
5 A. I did some work for him in his mother's
6 house.
7 Q. Where was that?
8 A. Palm Beach. What year? Before -- before
9 I came to work for Jeffrey.
10 Q. Is that who recommended that you work for
11 Jeffrey Epstein?
12 A. I guess so.
13 Q. Okay. When you started with Jeffrey
14 Epstein, what were your job duties?
15 A. I was doing maintenance. I was doing
16 building and rebuilding and maintenance work
17 basically. Because he just bought the house at that
18 time. And because of Mr. Wechsler knowing me, they
19 recommend me to go to the house and take a look at
20 the house. And we start tearing the house down,
21 basically, at the beginning of my job.
22 Q. Did you assist in the teardown?
23 A. Yes.
24 Q. Okay. So your job duties then was that of
25 a maintenance?

1 JOHN ALESSI
2 A. Maintenance, building.
3 Q. Got it.
4 And did you meet Mr. Epstein when you
5 were -- in 1990?
6 A. Yes, I met him.
7 Q. Okay. And in 1991, who made the decision
8 for you to become a full-time employee?
9 A. Jeffrey.
10 Q. And as a full-time employee initially,
11 what was your job?
12 A. I was basically maintenance, the same
13 thing as I was doing with -- I was exclusively
14 working for him. I was full-time working for him as
15 maintenance, because the house was still on
16 renovation, and he wanted me there.
17 Q. Okay. And how was your relationship with
18 Mr. Epstein back then, 1991?
19 A. Great. No problem.
20 Q. It was good?
21 A. It was good.
22 Q. Did he have a girlfriend back then, in
23 1991?
24 MR. PAGLIUSCA: Object to the form and
25 foundation.

1 JOHN ALESSI
2 You can answer the question.
3 Occasionally, I'll need to object for the
4 record in case we need to have a discussion
5 about this with the judge. And so that's just
6 me preserving those objections.
7 THE WITNESS: Yes, he had a girlfriend.
8 Her name was Dr. Andersson, Eva Andersson. And
9 she was there just for a few months after I
10 came to the house.
11 BY MR. EDWARDS:
12 Q. And how was your relationship with
13 Dr. Andersson?
14 A. Fine.
15 Q. Okay. And at the time when Mr. Epstein
16 was -- at the time when Dr. Andersson was Jeffrey
17 Epstein's girlfriend, did you see any other female
18 companions around the house?
19 A. Eventually -- they have a lot of guests,
20 too. They did have guests coming in. But I can't
21 remember exactly who. It's a socialite. So they
22 have friends.
23 Q. At the time when Dr. Andersson was
24 Mr. Epstein's girlfriend, was Mr. Epstein getting
25 massages?

1 JOHN ALESSI
2 MR. PAGLIUSCA: Object to the form and
3 foundation.
4 THE WITNESS: I think so. I was not
5 involved in the house, inside of the house that
6 much. But they always got massages. Always.
7 BY MR. EDWARDS:
8 Q. Okay. I'm talking about the time period
9 when Dr. Andersson was there.
10 A. Yes, they got massages.
11 Q. Okay. So do you remember other female
12 visitors when Dr. Andersson was Mr. Epstein's
13 girlfriend?
14 A. I don't remember. I remember people being
15 there, visitors, but I cannot remember that far.
16 Q. Okay. After -- did there come a point in
17 time when Dr. Andersson was no longer Mr. Epstein's
18 girlfriend?
19 A. Right.
20 Q. Yes?
21 A. Yes.
22 Q. And did he -- did he have a new
23 girlfriend?
24 MR. PAGLIUSCA: Object to form and
25 foundation.

1 JOHN ALESSI
2 Q. All right.
3 Who was in charge of the Palm Beach house?
4 A. I was.
5 Q. All right.
6 Who was your direct supervisor?
7 A. Mr. Epstein. He would deal with me
8 directly, or if he was not available, Ms. Maxwell.
9 Q. Okay. I want you to go to Exhibit 3 and
10 page -- page 179, line 8.
11 A. Line 8, "QUESTION: And then Maxwell came
12 and she took over you as your immediate supervisor?
13 Yes. That's correct. Yes. She became
14 the supervisor not only for this house, but for all
15 the homes.
16 Q. Okay. So your immediate supervisor was
17 Ms. Maxwell?
18 A. Ms. Maxwell. But if Mr. Epstein was at
19 the house, I would never go to Ms. Maxwell; I would
20 go to him directly, or he would come to me.
21 Q. Okay. At some point in time towards the
22 end of your tenure, did you come to resent
23 Ms. Maxwell?
24 MR. PAGLIUSCA: Object to the form and
25 foundation.

1 JOHN ALESSI
2 Q. And where did the massage therapists --
3 where did they come from?
4 A. Most, they came from Palm Beach. Palm
5 Beach County.
6 Q. And over the course of that 10-year period
7 of time while Ms. Maxwell was at the house, do you
8 have an approximation as to the number of different
9 females -- females that you were told were massage
10 therapists that came to the house?
11 MR. PAGLIUSCA: Object to form and
12 foundation.
13 THE WITNESS: I cannot give you a number,
14 but I would say probably over 100 in my stay
15 there.
16 BY MR. EDWARDS:
17 Q. And many of the times would the females
18 come only one time and not return?
19 MR. PAGLIUSCA: Object to form and
20 foundation.
21 BY MR. EDWARDS:
22 Q. Let me ask that a different way.
23 Were there times when some of these
24 females that would come to the house, and you were
25 told that they were massage therapists, would come

1 JOHN ALESSI
2 BY MR. EDWARDS:
3 Q. Okay. And who would find the massage
4 therapist to bring to the house?
5 A. They would call me in my office, and they
6 would say, Get me a massage at 10:00 with this
7 person.
8 I have a list of the massage therapists, a
9 Rolodex, or a card, and I would call them for the
10 specific time they want a massage. And I would do
11 that.
12 Q. I don't think I asked the right -- the
13 question that I was looking to ask, so let me go
14 back.
15 Did you go out looking for the girls --
16 A. No.
17 Q. -- to bring --
18 A. Never.
19 Q. -- as the massage therapists?
20 A. Never.
21 Q. Who did?
22 A. Ms. Maxwell, Mr. Epstein and their
23 friends, because their friends relayed to other
24 friends they knew a massage therapist and they would
25 send to the house. So it was referrals.

1 JOHN ALESSI
2 foundation. Hold on. That misstates what is
3 happening in this deposition, because the word
4 "recruit" was introduced by the lawyers in this
5 deposition. So I object to your
6 characterization of the testimony.
7 BY MR. EDWARDS:
8 Q. I'll read for you the question and the
9 answer.
10 The question was: "QUESTION: When did
11 that role get transferred from you to Ms. Maxwell,
12 the role of looking after girls or calling the
13 girls?
14 "ANSWER: I didn't look after -- out for
15 girls. Ms. Maxwell was the one that recruit. I
16 remember one occasion or two occasions she would say
17 to me, John, give me a list of all the spas in Palm
18 Beach County, and I will drive her from one to the
19 other to PGA in Boca; and she would go in and drop
20 credit cards -- not credit cards but business cards,
21 and she would come out. And then we'd go to -- she
22 will recruit the girls. Was never, never done by me
23 or Mr. Epstein or anyone else that I know of."
24 Is that truthful testimony?
25 A. It is truthful; however, I think

1 JOHN ALESSI
2 "recruiting," for myself, for my point of view, is
3 hiring immediately and recruit the person.
4 I think she was looking for massage
5 therapists. She was looking for the best kind. She
6 went -- and you're right, I went one time with her,
7 or twice maybe, to different spas and different
8 clubs, great clubs, I mean, in Boca, in Fort
9 Lauderdale, in -- in Palm Beach. She was looking
10 for the best massage therapists available.
11 How she find these girls, I don't know. I
12 just drove there. I just was the driver. I never
13 was involved with any of the offerings or
14 negotiations or meeting these girls. Never.
15 Q. Okay. Ms. Maxwell was the one that would
16 meet the girls?
17 A. Yeah.
18 Q. Okay. Did you ever check any of the IDs
19 for any of these girls?
20 A. I was not -- that was not in my everyday
21 things to do. It was not.
22 Q. That was just not part of your job?
23 A. That was not my job.
24 Q. Did Ms. Maxwell take photographs while she
25 was at the Palm Beach house?

1 JOHN ALESSI
2 MR. PAGLIUSCA: Object to form and
3 foundation.
4 THE WITNESS: Himself. Himself.
5 BY MR. EDWARDS:
6 Q. And you do not know the ages of the
7 various massagists, right?
8 A. No.
9 Q. Did you have occasion to clean up after
10 the massages?
11 A. Yes.
12 Q. Okay. And that is after both a massage
13 for Jeffrey Epstein, as well as clean up after a
14 massage that Ghislaine Maxwell may have received?
15 A. Yes.
16 Q. And on occasion, after -- in cleaning up
17 after a massage of Jeffrey Epstein or Ghislaine
18 Maxwell, did you have occasion to find vibrators or
19 sex toys that would be left out?
20 MR. PAGLIUSCA: Object to form and
21 foundation.
22 THE WITNESS: Yes, I did.
23 BY MR. EDWARDS:
24 Q. Can you describe the types of vibrators or
25 sex toys that you found left out after a massage

1 JOHN ALESSI
2 that Jeffrey Epstein had just received or Ghislaine
3 Maxwell had just received?
4 MR. PAGLIUSCA: Object to form and
5 foundation.
6 THE WITNESS: It was probably two to three
7 times, I would say. It was not all the time.
8 I would find things like a dildo, it's called a
9 double. I hate to say it because these ladies.
10 But I find these things, put my gloves on, took
11 it out and rinse it, and put it in
12 Ms. Maxwell's closet.
13 BY MR. EDWARDS:
14 Q. Why would you put the dildo or sex toy in
15 Ms. Maxwell's closet?
16 A. Because I knew that's where they were
17 kept.
18 Q. How did you know that the sex toys were
19 kept in Ms. Maxwell's closet?
20 A. Because I know where everything was in
21 that house. Every single room, every single thing,
22 it was a place, it was placed by me, by the cleaning
23 lady or my wife. Every -- everything that happened
24 in that house, I knew it.
25 Q. Who showed you where the dildo or sex toys

1 JOHN ALESSI

2 were kept in the house the first time?

3 MR. PAGLIUSCA: Object to form and

4 foundation.

5 THE WITNESS: Nobody. Nobody show me.

6 BY MR. EDWARDS:

7 Q. You just saw it?

8 A. I saw it.

9 Q. So you knew where to put it back?

10 A. Yeah. We had to open the closet, clean

11 the closet, put the clothes in place, put the shoes

12 in place, put everything in place. So it was a

13 matter of tidying things up.

14 Q. Did you ever find any costumes?

15 A. I saw one shiny black costume, but I

16 didn't even know --

17 Q. Where did you see it?

18 A. The same place.

19 Q. In Ms. Maxwell's closet?

20 A. Yes.

21 Q. And where was Ms. Maxwell's closet in the

22 house?

23 A. In the house? It was in the opposite side

24 of his bathroom. It was her bathroom in the master

25 bedroom. It was in the middle. So it was on the

1 JOHN ALESSI
2 BY MR. EDWARDS:
3 Q. That demonstrates that she was, I believe,
4 terminated from her employment in 2000.
5 My question to you is: Do you remember
6 what time of year or what month it would have been,
7 whether spring, summer, fall, winter; January,
8 February, December?
9 A. Of what year?
10 Q. Of 2000, that you would have gone to the
11 Mar-a-Lago?
12 A. It wasn't 2000.
13 MR. PAGLIUSCA: Object to form and
14 foundation.
15 BY MR. EDWARDS:
16 Q. Okay. Do you think it was a different
17 year that you went to Mar-a-Lago?
18 A. Yes.
19 Q. Okay. What year do you believe that you
20 went to the Mar-a-Lago to pick Virginia up?
21 A. I think it was 2000 and -- I think it was
22 the summer of 2002.
23 Q. Okay.
24 A. Summer, because I remember that day that I
25 was sweating like hell in the -- in the car, waiting

1 JOHN ALESSI
2 for Ms. Maxwell to come out of the massage.
3 Q. Okay. So what month of the summer do you
4 remember it being?
5 A. I think in June, July, maybe, 2001.
6 Q. 2000 and what?
7 A. 2001.
8 Q. June, July, 2001, that's when you believe
9 that it was?
10 A. Yes.
11 Q. Okay. And do you remember the month --
12 A. No, sorry. Sorry. Not 2001. We left in
13 December 31st. It was 2000 -- the last year that I
14 was working for Jeffrey, when I met Virginia.
15 Q. Your recollection, as you sit here
16 today --
17 A. It was 2002.
18 Q. -- is that it was June or July of 2002 --
19 A. 2002.
20 Q. -- when you met Virginia Roberts at the
21 Mar-a-Lago?
22 A. My recollection.
23 Q. Okay. And other than the fact that you
24 were sweating, what else tells you what month that
25 it was that you remember meeting her at the

1 JOHN ALESSI
2 Mar-a-Lago?
3 A. It was -- I know it was summer of 2002,
4 and she spoke to -- far away. I wasn't -- I was in
5 the driveway, and she was far away talking to
6 Virginia. She spoke to her maybe five minutes.
7 Q. Okay.
8 A. And she came to the car, and we went home.
9 In the afternoon, about 4:00 or 5:00 in the
10 afternoon, the same day, Virginia came to the house.
11 Q. Who brought her to the house?
12 A. I don't know. She came to the back door,
13 I remember. And she was dressed differently. She
14 came to the house.
15 Q. When you first arrived to the Mar-a-Lago
16 with -- are you driving the car and Ms. Maxwell is
17 in the passenger seat?
18 A. Yes.
19 Q. And could you see Virginia Roberts from
20 the car?
21 A. Yes.
22 Q. Where was she sitting or standing? How
23 far away from the car?
24 A. She was standing right in front of the
25 driveway. This is the Mar-a-Lago, the house, and

1 JOHN ALESSI
2 here is the spa, and the driveway that's here. I
3 was parked this way, and I would see her with
4 Ms. Maxwell, talking.
5 Q. Did you --
6 A. I could not hear what they were saying,
7 but I did see it.
8 Q. Did you park the car or did you stop right
9 there and --
10 A. I parked the car because we are not
11 allowed to go into Mar-a-Lago.
12 Q. Okay. Let me finish my question.
13 Did you park the car in a parking space in
14 the parking lot or did you just stop on the side of
15 the road and Ms. Maxwell got out?
16 A. Mar-a-Lago has a -- has a long wide
17 driveway, and on the right of the driveway is -- is
18 the parking spots like this or something. And I
19 parked in one of those spaces. And waiting for her,
20 I think it was over an hour that I wait for her.
21 Q. Okay. So did you watch her first talk
22 to --
23 A. No. At the end. Right at the end,
24 before -- when she was leaving.
25 Q. So Ms. Maxwell gets out of the car. And

1 JOHN ALESSI
2 when you're pulling up to the Mar-a-Lago, could you
3 see Virginia Roberts then?
4 A. No. No.
5 Q. So after you wait an hour, Ms. Maxwell is
6 coming out?
7 A. And then she saw Virginia and she
8 stopped -- she went to her, she talked to her, she
9 came back to the car.
10 Q. And prior to that day, you had never seen
11 Virginia at the house?
12 A. Never. Never.
13 Q. Okay. Did Ms. Maxwell tell you that
14 Virginia's father worked at the Mar-a-Lago?
15 A. I don't think so. I think it was -- I
16 think we find out later, after the -- she says, My
17 father works -- I think it was from Virginia, that
18 she says her father works at Mar-a-Lago.
19 It is information from her. I don't think
20 it was Ms. Maxwell that told me anything. She don't
21 have to -- she don't have to talk to me. I mean,
22 Ms. Maxwell will not go and talk to me about this --
23 these people's family. I don't know. She never
24 did.
25 Q. Okay. I only have to go by what I have.

1 JOHN ALESSI
2 I don't remember that day, how she got
3 home. I don't know. I can't remember.
4 Q. After that day, do you recall that she
5 started coming to the house more frequently?
6 A. Yes, she did.
7 Q. In fact, did she start coming to the house
8 approximately three times a week?
9 A. Yes, probably.
10 Q. And at times, would you go pick her up?
11 A. Yes. This happened maybe twice, three
12 times.
13 Q. And at times, would you take her home?
14 A. Yes.
15 Q. And did there come a point in time where
16 Virginia starting bringing other girls with her?
17 MR. PAGLIUSCA: Object to form and
18 foundation.
19 THE WITNESS: That was maybe two weeks
20 before we left. I saw her bringing some
21 friends with her to the house. And I cannot
22 remember how many times, but I was at the end
23 of our stay.
24 BY MR. EDWARDS:
25 Q. At the end of her [sic] stay, you saw when

1 JOHN ALESSI
2 she would come over to the house, she would bring
3 certain friends who were girls --
4 MR. PAGLIUSCA: Object to form and
5 foundation.
6 BY MR. EDWARDS:
7 Q. -- to the house, right?
8 A. Yes, females, yes.
9 Q. Do you know how long Virginia had been
10 coming over to the house before she started
11 traveling on an airplane with Ghislaine and Jeffrey?
12 MR. PAGLIUSCA: Object to foundation.
13 THE WITNESS: Not too long. I don't think
14 it was too long after that.
15 BY MR. EDWARDS:
16 Q. Would you drive her to the airport with
17 them?
18 A. Occasionally, I think so, yes. I would
19 drive everybody to the airport. My wife would drive
20 the chefs, the service people, the luggage to Jet
21 Aviation.
22 Q. Is that where Mr. Epstein kept his plane,
23 Jet Aviation?
24 A. Yes.
25 Q. At some point did Ghislaine Maxwell become

1 JOHN ALESSI
2 MR. PAGLIUSCA: Seven.
3 MR. EDWARDS: Seven?
4 (The referred-to document was marked by
5 the court reporter for Identification as
6 Deposition Exhibit 7.)
7 MR. EDWARDS: I apologize, Jeff. I just
8 can't find a copy right now.
9 MR. PAGLIUSCA: I have it.
10 MR. EDWARDS: Okay.
11 BY MR. EDWARDS:
12 Q. So this is a composite exhibit. It is
13 four pages. The first one that you're looking at
14 should be -- do you have SAO 01456?
15 MR. PAGLIUSCA: Yes.
16 MR. EDWARDS: Okay.
17 BY MR. EDWARDS:
18 Q. Does the format of this look familiar to
19 you?
20 A. Yes. It looks like the books that we used
21 to have that has -- the message books.
22 Q. How would that work? How would that
23 process work?
24 A. Somebody called, you write it down, and
25 you take the -- you leave the copy in the -- in the

1 JOHN ALESSI
2 many things?
3 A. Yes, she did.
4 Q. Interesting buildings?
5 A. No. She -- she liked -- she had a dog,
6 and she took a lot of photographs of her dog. And
7 us. And she took photographs of the cars and the
8 house. Everything inside. She had an album full of
9 photographs of people, young girls, girls. And I
10 remember that she had. Like a hobby.
11 Q. Right.
12 You never saw any pictures that were very
13 upsetting to you, though, correct?
14 A. No. No.
15 Q. Okay. And the pictures that you saw were
16 sort of -- would you describe them as being artistic
17 kind of pictures?
18 MR. EDWARDS: Objection, counsel
19 testifying.
20 THE WITNESS: I think so. I don't think
21 they were pornographic. I don't think it was
22 any vaginal or things, you know, female parts
23 showing. It was some girls were topless,
24 taking the sun. It was a beautiful house, it
25 was a beautiful setting, so she took a lot of

1 JOHN ALESSI
2 CERTIFICATE OF OATH
3 STATE OF FLORIDA)
4 COUNTY OF MIAMI-DADE)
5
I, the undersigned authority, certify
6 that JOHN ALESSI personally appeared before me
and was duly sworn.
7 WITNESS my hand and official seal
this 1st day of June, 2016.
8
9
Kelli Ann Willis, RPR, CRR
10 Notary Public, State of Florida
Commission FF928291, Expires 2-16-20
11 + + + + + + + + + + + + + + + + + + +
12 CERTIFICATE
13 STATE OF FLORIDA)
14 COUNTY OF MIAMI-DADE)
15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of JOHN ALESSI; that a review
of the transcript was not requested; and that the
18 transcript is a true record of my stenographic
notes.
19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.
22 Dated this 1st day of June, 2016.
23
24 KELLI ANN WILLIS, RPR, CRR
25

EXHIBIT 2

(Filed Under Seal)

1 UNITED STATES DISTRICT COURT
for the
2 SOUTHERN DISTRICT OF NEW YORK

3 Civil Action No. 15-cv-07433-RWS

4 VIRGINIA GIUFFRE,

5 Plaintiff,

6 vs.

7 GHISLAINE MAXWELL

8 Defendant.

9 ---

10 VIDEO-DEPOSITION
OF: JAMES MICHAEL AUSTRICH
11
TAKEN BY: Defendant
12
REPORTED BY: Karla Layfield, RMR
13 Stenographic Court Reporter
Notary Public
14 State of Florida at Large

15 DATE AND TIME: June 23, 2016; 9:03 a.m.

16 PLACE: Owen & Associates Court Reporters
108 N. Magnolia Avenue, Suite 501
17 Ocala, Florida

18 APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
19 150 East 10th Avenue
Denver, Colorado 80203
20 Attorney for Defendant

21 Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
22 FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
23 Fort Lauderdale, Florida 33301
Attorney for Plaintiff
24
Also Present: Kenneth Sarsony, Videographer
25 Virginia Giuffre

1 A Yes.
2 Q Was it is a franchise, if you know?
3 A I know when I first started there, they were
4 corporate, but then they were a franchise. They were
5 bought out. But I'm not sure if when I got there they
6 were a franchise or not.
7 Q Got it.
8 Do you know if Ms. Roberts had any previous
9 employment before she worked at Taco Bell?
10 A I think by the apartment, she worked for KFC for
11 a little while.
12 MS. MENNINGER: Are you looking at Ms.
13 Roberts?
14 THE WITNESS: I'm thinking. I can't
15 remember. I remember something with KFC. They
16 had one really close to us. I think she worked
17 there for a tiny, tiny bit. I'm not sure.
18 MS. MENNINGER: Okay.
19 BY MS. MENNINGER:
20 Q Before the Taco Bell?
21 A Or she could've applied there. It's just in my
22 head. She might have just applied there, and didn't get
23 it, and that's why I brought her to Taco Bell.
24 Q Okay.
25 A Because we were both the night managers.

1 A No.
2 Q Do you know about what years this was?
3 A Not really.
4 Q Do you know about how old you were?
5 A When, what?
6 Q I'm just focused on the period of time in which
7 you were living at her parent's house in the trailer.
8 A I was probably 18 when we moved in there.
9 Q And you said you were only there for a couple of
10 months?
11 A Not that I remember. Like, it might have been a
12 little longer. I'm not sure.
13 Q Were you engaged to Ms. Roberts?
14 A Yes.
15 Q When did you become engaged to her?
16 A When we were living in Oakland Park.
17 Q Tell me about the engagement. How did it come
18 about?
19 A Well, we fell in love, and -- I believe it was
20 Valentine's Day when I proposed.
21 Q Did you have a ring?
22 A Yes.
23 Q Did she accept?
24 A Yes.
25 Q How long were you engaged?

1 A Yes -- well, for a while. I mean, I know at the
2 end, I wasn't working anywhere.
3 Q Why weren't you working?
4 A I don't remember the exact reason.
5 Q Had you quit?
6 A I believe so. I know the pet store let me go
7 for walking on to the other side talking to somebody. But
8 I don't remember why I left Dunkin' Donuts.
9 Q Do you believe that you were fired from Dunkin'
10 Donuts?
11 A No. That pet store was the only time anybody
12 ever fired me.
13 Q That will stick in your brain.
14 A Yeah.
15 Q At the time that you left the pet store, was
16 Ms. Roberts still working there?
17 A Yes.
18 Q And how long do you recall her working there?
19 A Not long.
20 Q I hate to do this to you, but what does "not
21 long" mean to you, weeks, months, days?
22 A Over a month. That's really all I can say.
23 Maybe over a month before she went to work at the
24 Mar-a-Lago or Donald Trump's country club.
25 Q Did she leave the pet store to go work at

1 BY MS. MENNINGER:
2 Q Did you know her friend by the name of Tony
3 Figueroa?
4 A Somewhat.
5 Q Tell me what you remember about Tony Figueroa.
6 A Other than him being an idiot, not much.
7 Q Did you have any interactions with Mr. Figueroa?
8 A Very little.
9 Q When do you recall seeing him, like, in what
10 city, I mean?
11 A Up in West Palm Beach.
12 Q Did he come over to your apartment?
13 A I believe so.
14 Q Did you believe them to be having a
15 relationship?
16 A At the very end when I left, yes.
17 Q Was that one of the reasons for your leaving?
18 A One of them.
19 Q What were the others?
20 A Well, after I found out about that, that's when
21 I heard about all the other stuff that was happening.
22 Q What did you hear about all the other stuff?
23 A Well, I mean, after she went to work for
24 Mar-a-Lago then she was, I guess, recruited to go work for
25 Jeff something. I don't remember his last name.

1 Q Is that what she told you "she was recruited"?
2 A Yeah. Well, she didn't use those words. But I
3 don't know why else anybody would take -- like, they hired
4 her over there as a massage therapist, but she didn't have
5 any experience.
6 Q At Mar-a-Lago --
7 A At Mar-a-Lago, yes. Then all of a sudden one
8 day, she was working for Jeff, whatever his name was.
9 Q Let me just take a step back. You found out
10 towards the end of your relationship with Ms. Roberts that
11 she was then having a relationship with Mr. Figueroa. Is
12 that right?
13 A I don't know if it was a relationship. But,
14 yes.
15 Q Enough to cause you to think you didn't want to
16 be engaged anymore?
17 A Yes.
18 Q Did you and Ms. Roberts have a fight at that
19 time?
20 A Yes.
21 Q What do you remember about the fight? What do
22 you recall?
23 A I don't recall. I remember us having a fight
24 and then leaving not too long afterwards.
25 Q You referred to finding out all this other stuff

1 Q When you got the apartment in Oakland Park, you
2 got it with Virginia?
3 A Well, yeah. She was living with us -- and
4 Mario.
5 MS. MENNINGER: All right. I think that's
6 all I have.
7 MR. EDWARDS: Okay.
8 THE VIDEOGRAPHER: We're going off the
9 record. This concludes disc one, volume one of
10 the video-deposition of James Michael Austrich.
11 We're going off the record. The time is
12 approximately 11:20 a.m.
13 (Break taken.)
14 THE VIDEOGRAPHER: We're back on the record
15 with disc two, volume one, of the video-
16 deposition of James Michael Austrich. And the
17 time is approximately 11:23 a.m. Thank you.
18 CROSS-EXAMINATION
19 BY MR. EDWARDS:
20 Q Mr. Austrich, as you know, my name is Brad
21 Edwards, and I represent Virginia.
22 A Yes.
23 Q I'm going to ask you some follow-up questions to
24 the questions that you were asked previously.
25 All right?

1 how long we lived there.
2 Q Okay. At some point in time, though, while
3 you're living on her parent's property, it becomes 1999?
4 A Yeah, I believe.
5 Q Okay. And so when you started living at her
6 parent's property, you're 18, she's 15, but at some point
7 in time you turn 19 and she turned 16?
8 A Yes.
9 Q Okay. And at some other point in time, she
10 leaves the job at the pet store?
11 A Pet store, yeah.
12 Q And goes to work at the Mar-a-Lago?
13 A Yes. At Donald Trump's country club, yeah.
14 Q Okay. Donald Trump's country club is called the
15 Mar-a-Lago?
16 MS. MENNINGER: Objection.
17 THE WITNESS: Yeah, that's what I always
18 remember it as. Yes.
19 BY MR. EDWARDS:
20 Q Is that right?
21 MS. MENNINGER: Objection, leading. I do get
22 a chance to object. Leading.
23 BY MR. EDWARDS:
24 Q When you used the term "Mar-a-Lago" and used the
25 term "Donald Trump's country club," are we talking about

1 A But if she had to get clean for her job, she
2 would have gotten clean for the job.
3 Q Okay. Do you remember her being hired as a
4 bathroom attendant there, a locker room attendant?
5 A Now that you're saying that, some kind of
6 attendant sounds familiar. But I don't really remember.
7 All I remember is for the massage. As a -- I don't
8 remember exactly what she got hired for at Donald Trump's
9 place. But I just remember the masseuse thing.
10 But as you're saying "the attendant," the
11 attendant sounds familiar because I doubt her father would
12 hire her as a massage therapist without knowing anything.
13 Q So you had known her for some period of time
14 before she gets this job at the Mar-a-Lago, right?
15 A Right.
16 Q Did she have any massage therapy training
17 whatsoever?
18 A No.
19 Q Ever given a massage to anyone?
20 A Not that I remember.
21 Q Ever given a massage to you?
22 A Not until she was already doing the massage
23 stuff. But, no, I don't remember any kind of massage
24 training or even like an inkling for it.
25 Q Okay. Then when she goes to work for

1 Mar-a-Lago, you don't remember, I think is the words you
2 used, whether she worked there for weeks or months?
3 A Yes.
4 Q You don't remember?
5 A No, not at all.
6 Q And at the time when she gets the job at the
7 Mar-a-Lago, do you remember where you were working, if
8 anywhere?
9 A No. I mean, I think at that time, I was working
10 at one of the places. But I don't really remember where.
11 Q And then, and I believe that you used this word,
12 correct me if I'm wrong, she's recruited to work for Jeff?
13 A Yes.
14 Q And do you remember her telling you that it was
15 an assistant or somebody associated with Jeff that
16 recruited her to work with Jeff?
17 MS. MENNINGER: Objection, leading.
18 THE WITNESS: I don't remember.
19 MS. MENNINGER: Misstates the testimony.
20 THE WITNESS: Sorry. I don't remember. All
21 I remember was that somebody got her from there to
22 Jeff.
23 MR. EDWARDS: Got it.
24 BY MR. EDWARDS:
25

1 Q Then there's months; November, December.
2 A So this is the year 2000, and these are the
3 months?
4 MS. MENNINGER: Objection to this entire line
5 of questioning. The witness has no foundation for
6 talking about this particular document.
7 BY MR. EDWARDS:
8 Q Okay. So do you know how long that -- as you
9 sit here today, do you remember how long Virginia had been
10 going over to Jeff's house before she started traveling on
11 an airplane with him?
12 MS. MENNINGER: Objection, foundation.
13 THE WITNESS: No.
14 BY MR. EDWARDS:
15 Q It could be months, it could be a year?
16 MS. MENNINGER: Objection, foundation.
17 THE WITNESS: I don't think it -- I don't
18 think she was there for very long without doing
19 traveling.
20 BY MR. EDWARDS:
21 Q But in your mind, you can't tell me how long
22 "very long" is?
23 A No, I mean, I don't.
24 Q Okay. And is there anything that would tell you
25 the year or the month in which you remember Virginia first

1 going over to Jeff's house?
2 A Not really.
3 Q There's nothing I could really show you in this
4 world that would remind you right now?
5 A No.
6 Q Okay. Before going over to work with Jeff, did
7 Virginia have any massage experience?
8 A No.
9 Q When -- I think you said with respect to
10 "bringing other girls, that sounds familiar," what other
11 girls do you remember her bringing? Do you remember their
12 names?
13 A I don't remember names.
14 MS. MENNINGER: Objection, foundation.
15 BY MR. EDWARDS:
16 Q Did you ever drive any of the other girls over
17 to Jeff's house?
18 A I don't think so.
19 Q Okay. How many times did you to to Jeff's
20 house?
21 A A few times. Like, I think I went -- I think I
22 dropped her off and somebody always brought her back. I
23 don't really remember picking her up too much.
24 Q Okay. And in the beginning, she was telling you
25 that she was performing massages?

1 A Yeah, something like that.
2 Q Do you know what time of year?
3 A No.
4 Q Do you know whether the spa at Mar-a-Lago closes
5 during the summers?
6 MR. EDWARDS: Form.
7 THE WITNESS: No, I have no idea.
8 BY MS. MENNINGER:
9 Q You don't know how she got the job with Jeff?
10 A No. I know somebody -- somebody -- like,
11 that's why I said "recruited" -- that's the only word I
12 can think of -- that worked for Jeff.
13 Q Why do you use the word "recruited"?
14 A Because that's the only word -- I don't know,
15 football or everything. That's the only word I can think
16 of, you recruit somebody.
17 Q Hired her?
18 A Yeah, I guess. It was -- it was just a very
19 fast thing.
20 Q You don't know who that person was?
21 A No.
22 Q You don't know what she said to that person?
23 A No.
24 Q You don't know what that person said to her?
25 A Nope.

1 Q Do you remember her coming home and saying "I
2 got a job with Jeff"?
3 A I remember she said she got a job with Jeff.
4 Q Did she tell about that job?
5 A I think it was -- I think at the time it was for
6 massage therapy, like, she was going to be a masseuse.
7 Q And she was excited about it?
8 A Yeah.
9 Q She wasn't sad about it?
10 A Not that I remember. But I really don't
11 remember much from back then.
12 Q She wasn't crying when she came home and said "I
13 just got a job with Jeff," right?
14 A No.
15 Q You're guessing that you -- she got the job with
16 Jeff before you moved into the Bent Oak apartment, but you
17 don't know. Correct?
18 MR. EDWARDS: Form
19 THE WITNESS: Yes. But I would think we
20 would have had to have had the money by then. So
21 that was the only time she was making real good
22 money.
23 BY MS. MENNINGER:
24 Q And do you know how much that apartment cost?
25 A I know it was expensive.

1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, Karla Layfield, RMR, Stenographic Court

5 Reporter, do hereby certify that I was authorized to and

6 did stenographically report the foregoing deposition of

7 James Michael Austrich; that said witness was duly sworn

8 to testify truthfully; and that the foregoing pages,

9 numbered 1 through 145, inclusive, constitute a true and

10 correct record of the testimony given by said witness to

11 the best of my ability.

12 I FURTHER CERTIFY that I am not a relative or

13 employee or attorney or counsel of any of the parties

14 hereto, nor a relative or employee of such attorney or

15 counsel, nor am I financially interested in the action.

16 WITNESS MY HAND this ___ day of June, 2016, at

17 Ocala, Marion County, Florida.

18

19 ______________________________

Karla Layfield, RMR

20 Stenographic Court Reporter

21

22

23

24

25

EXHIBIT 3

(Filed Under Seal)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

VIRGINIA L. GIUFFRE,
Plaintiff,
-against-
GHISLAINE MAXWELL,
Defendant.
_____________________________/

250 N. Australian Avenue,
Suite 1400
West Palm Beach, Florida 33401
Friday, September 9, 2016
8:35 a.m. - 2:08 p.m.

C O N F I D E N T I A L

VIDEOTAPED DEPOSITION OF JEFFREY EPSTEIN

Taken before Darline M. West,
Registered Professional Reporter, Notary Public
in and for the State of Florida At Large,
pursuant to Notice of Taking Deposition filed
by the Plaintiff in the above cause.

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

(866) 624-6221

1 J. Epstein - Confidential
2 BY MR. CASSELL:
3 Q. Isn't it true that Maxwell led Virginia up
4 to your Palm Beach mansion massage room the first
5 time you met her?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Fifth.
9 BY MR. CASSELL:
10 Q. You saw Maxwell bringing Virginia up to
11 your room, true, sir?
12 MR. PAGLIUCA: Object to form and
13 foundation.
14 THE WITNESS: Fifth.
15 BY MR. CASSELL:
16 Q. Isn't it true that it was standard
17 operating procedure for Maxwell to bring underage
18 girls up to your room?
19 MR. PAGLIUCA: Object to form and
20 foundation.
21 THE WITNESS: Fifth.
22 BY MR. CASSELL:
23 Q. Isn't it true that it was standard
24 operating procedure for Maxwell to bring underage
25 girls up to your room for you to sexually abuse?

1 J. Epstein - Confidential
2 THE WITNESS: Fifth.
3 BY MR. CASSELL:
4 Q. In 2000, Virginia was approached by
5 Maxwell, true?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Fifth.
9 BY MR. CASSELL:
10 Q. Maxwell was one of the main women whom you
11 used to procure underage girls for sexual activities,
12 true?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: Fifth.
16 BY MR. CASSELL:
17 Q. It was your understanding that Maxwell met
18 Virginia at the Mar-a-Lago Club in Palm Beach in
19 2000, true?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. In 2000, you were a member of the
25 Mar-a-Lago Club, true?

1 J. Epstein - Confidential
2 MR. PAGLIUCA: Object to form.
3 THE WITNESS: Fifth.
4 BY MR. CASSELL:
5 Q. In 2000, Ms. Maxwell had access to the
6 Mar-a-Lago Club, true?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: Fifth.
10 BY MR. CASSELL:
11 Q. The reason Maxwell had access to the
12 Mar-a-Lago Club in 2000 was because of your
13 connections to the club, true?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Fifth.
17 BY MR. CASSELL:
18 Q. Maxwell was a primary co-conspirator in
19 your sexual abuse scheme, true?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Fifth.
23 BY MR. CASSELL:
24 Q. Maxwell was a primary co-conspirator in
25 your sex trafficking scheme, true?

1 J. Epstein - Confidential
2 MR. PAGLIUCA: Object to form and
3 foundation.
4 THE WITNESS: Fifth.
5 BY MR. CASSELL:
6 Q. Maxwell herself regularly participated in
7 your sexual exploitation of minors, true?
8 MR. PAGLIUCA: Object to form and
9 found.
10 THE WITNESS: Fifth.
11 BY MR. CASSELL:
12 Q. In 2000, Maxwell herself regularly
13 participated in your sexual exploitation of minors,
14 true?
15 MR. PAGLIUCA: Object to form and
16 foundation.
17 THE WITNESS: Fifth.
18 BY MR. CASSELL:
19 Q. Maxwell herself regularly participated in
20 your sexual exploitation of Virginia, true?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Fifth.
24 BY MR. CASSELL:
25 Q. Did Maxwell participate in your sexual

1 REPORTER'S CERTIFICATE

2

STATE OF FLORIDA

3 COUNTY OF PALM BEACH

4

5 I, DARLINE MARIE WEST, RPR, certify that I was

6 authorized to and did stenographically report the

7 foregoing deposition; and that the transcript is a

8 true record thereof.

9

10 I further certify that I am not a relative,

11 employee, attorney, or counsel of any of the parties,

12 nor am I a relative or employee of any of the

13 parties' attorney or counsel connected with the

14 action, nor am I financially interested in the

15 action.

16

17 Dated this 13th day of September 2016.

18

19

20

21 ______________________________

22 DARLINE MARIE WEST, RPR

23

24

25

EXHIBIT 4

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.
_______________________/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 1 of 2

Pages 1 - 157

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company
B. Paul Katz Professional Center
(SunTrust Building)
One Florida Park Drive South
Suite 214
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

1 Q Right?
2 A Yeah.
3 Q And she travelled the world?
4 A Uh-huh (affirmative). Yes.
5 Q Did JJ say there was anything weird about
6 her job?
7 A No.
8 MR. EDWARDS: Object to the form.
9 BY MS. MENNINGER:
10 Q Did you know whether she had any massage
11 training?
12 A I did not. Like I said, the past three --
13 three or four years before then, I had no contact
14 with her whatsoever. So I had no clue what she was
15 certified in or had done with her life.
16 Q Okay. I would like to take about a five-
17 or ten-minute break, if that's okay with you.
18 A That's fine.
19 THE VIDEOGRAPHER: The time is 10:13. We
20 are off the record.
21 The time is 10:27. We are back on the
22 record.
23 MS. MENNINGER: All right. I would like
24 to mark as an exhibit now Defendant's
25 Exhibit 4.

1 certain times and stuff. And it would just -- you
2 know, it just did not make sense to me that it it
3 was just a masseuse, you know. Like I said, he's a
4 billionaire. You can afford another masseuse. Why
5 do you need her, you know.
6 Q Do you know whether he --
7 (Brief interruption.)
8 A Let me turn this down.
9 Q Sorry.
10 A I'm sorry.
11 (Briefly off the record.)
12 Q Do you know whether he had other masseuses
13 at the time?
14 A I -- I really don't know. All I know is
15 he would have Virginia, obviously, go out and look
16 for other girls, also, to bring back, as well.
17 Q And how do you know that?
18 A Because she had explained to me that
19 sometimes when she would go out on trips that her
20 and Ms. Maxwell and stuff would go out to, like,
21 clubs and stuff and just try and pick up girls to
22 bring back, so...
23 Q That's what Virginia told you?
24 A Yes.
25 Q All right. Did any of your information --

1 (Brief interruption.)
2 A I thought I muted it.
3 Q Did any of your information come from
4 anywhere other than Virginia?
5 A No.
6 MR. EDWARDS: Object to the form.
7 A Like I said, I did not talk -- I did not
8 really speak to any of them other than, you know,
9 hi, how's it going and stuff like that, until I had
10 actually met Jeffrey. And then he was the only one
11 I ever really spoke with. I had met Ms. Maxwell a
12 couple of times, but it was never, like, you know,
13 actual conversations, so...
14 BY MS. MENNINGER:
15 Q All right. Well, let me -- when did you
16 meet Jeffrey?
17 A I'd probably say -- probably a few months
18 after I had moved in with her.
19 Q Okay. And how did you come to meet
20 Jeffrey?
21 A Dropping her off over at his mansion.
22 Q And did you drop her off using her car?
23 A Yes.
24 Q And so she just asked you: Can you take
25 me over there?

1 A Yeah.
2 Q And did she tell you where to go?
3 A Yeah. She told where he lived and
4 everything. And then obviously I got to take the
5 car, because she was going somewhere else in the
6 world and did not need it, so...
7 Q You were dropping her off for a multi-day
8 trip?
9 A Yeah. She would normally go about two
10 weeks out of every month, so...
11 Q Two weeks straight?
12 A Yeah. It was two weeks home and two weeks
13 gone, basically.
14 Q Did you always take her to his house,
15 or...
16 A Yeah. Pretty much every time I took her
17 there, it was always to his mansion. I picked her
18 up one time -- maybe it was a couple of times --
19 from the jet stream place. But pretty much every
20 single time it was at the hou- -- at the mansion.
21 (Brief interruption.)
22 Q Okay. So you're -- is that your phone?
23 I'm --
24 A No, it is. I thought I muted it.
25 Q That's okay.

1 talking like that, so...
2 Q Okay. Where did your first conversation
3 with Jeffrey take place?
4 A I'm pretty sure it was in the kitchen or
5 the living room.
6 Q Inside the house?
7 A Yeah, it was inside the house. I've never
8 seen him anywhere else other than in the mansion or
9 getting off the jet.
10 Q So you were allowed to go inside the
11 house --
12 A Yeah.
13 Q -- with Ms. Roberts?
14 A Yeah. But I never went upstairs. I've
15 only been in the kitchen, the living room, and by
16 the pool.
17 Q How many times would you estimate that you
18 had been over to the house?
19 A I mean, at least once every two weeks to
20 drop her off, you know.
21 Q Was there a period of time between 2001
22 and when she left in 2002 where she was not working
23 for Jeffrey?
24 A Yes.
25 Q What period of time was that?

1 A It was pretty much, like, when she was
2 actually working as a server. Like, basically
3 because we were trying to not have her go back
4 there. Like, she did not want to go back there.
5 And we were trying to just work without needing his
6 money, you know.
7 Q All right. And if I can re-call up that
8 Exhibit 2, can you see from here when about she was
9 working as a server?
10 A March 4th, '02.
11 Q Do you know about how long she worked
12 there?
13 A I do not. I'm not sure.
14 Q Days? Weeks? Months? Anything?
15 A I really have no clue.
16 Q Okay. How old was Ms. Roberts in 2002, if
17 you know?
18 A I'd probably say, like, 18 or so, maybe.
19 Q If her birthday is in '83 --
20 A Oh, if it's in '83, then I'd say --
21 because I was born in '82, so a year younger than me
22 would be...
23 Q 18, 19?
24 A Yeah, somewhere around there.
25 MR. EDWARDS: Object to the form.

1 Q I guess my question is: Did she ever tell
2 you that she had started as a regular masseuse for
3 him and then transitioned to something other than a
4 masseuse?
5 A No. She never said that it transitioned.
6 But she ended up explaining to me what had happened
7 before, so...
8 Q What has -- what is that?
9 A That her and Ms. Maxwell and Jeffrey would
10 obviously be doing stuff, all three of them
11 together. Like I said, that they would all go out
12 to clubs to pick up girls and try and find them to
13 bring back for Jeffrey. And then she told me about
14 how, like I said, her and Ms. Maxwell and Jeffrey
15 were all intimate together on multiple occasions.
16 Q When did she tell you this?
17 A I'm not exactly sure on the dates.
18 Q Was it while you were still together?
19 A Yes.
20 Q Did you -- had you met Ms. Maxwell?
21 A Yeah, I had met her a couple of times.
22 Q When did you meet Ms. Maxwell?
23 A Dates, I'm unsure of. But it was pretty
24 much, like I said, at Jeffrey's house in the
25 kitchen.

1 Q Was it earlier in the time you were with
2 her, or...
3 A It was about -- I'd say about six months
4 or so. I don't know. I'm not exactly positive.
5 Q All right. So at the time you met
6 Ms. Maxwell, had Ms. Roberts already told you that
7 she had been intimate?
8 A No. She had told me about that, I
9 believe, after I had max- -- after I had already met
10 her.
11 Q Okay. And tell me everything that you
12 remember about what Ms. Roberts said about being
13 intimate with Ms. Maxwell and Mr. Epstein at the
14 same time.
15 A I remember her talking about, like,
16 strap-ons and stuff like that. But, I mean, like I
17 said, all the details are not really that clear.
18 But I remember her talking about, like, how they
19 would always be using and stuff like that.
20 Q She and Ms. Maxwell and Mr Epstein would
21 used strap-ons?
22 A Uh-huh (affirmative).
23 Q How did you feel about that?
24 A I just -- obviously not happy about it.
25 Q What did you say?

1 A I did not.
2 Q When the FBI interviewed you, did you
3 mention this to them?
4 A I mentioned -- anything they asked me, I
5 did not hold anything back.
6 Q Okay. Do you recall specifically talking
7 about sex with the Prince?
8 A I -- I don't recall talking to them about
9 that, but, I mean, it's -- it could be possible.
10 Q Other than sex with the Prince, is there
11 anyone else that Jeffrey wanted Ms. Roberts to have
12 sex with that she relayed to you?
13 A Mainly, like I said, just Ms. Maxwell and
14 all the other girls.
15 Q Ms. Maxwell wanted -- Jeffrey wanted
16 Virginia to have sex with Ms. Maxwell?
17 A And him, yeah.
18 Q And did she tell you whether she had ever
19 done that?
20 A Yeah. She said that she did.
21 Q And when did she tell you that?
22 A I'm not sure on the date.
23 Q And what did she describe having happened?
24 A I believe I already told you that. With
25 the strap-ons and dildos and everything.

1 CERTIFICATE OF REPORTER

2

STATE OF FLORIDA)
3)
COUNTY OF VOLUSIA)
4

5

6

7 I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did
8 stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a
9 true record of my stenographic notes.

10 I further certify that I am not a relative, employee, attorney, or counsel of any of the
11 parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the
12 action, nor am I financially interested in the action.
13

Dated this 5th day of July, 2016.
14

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16

17

18

19

20 Leanne W. Fitzgerald, FPR
Florida Professional Reporter
21

Digital Certificate Authenticated
22 By Symantec

23

24

25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE: 15-cv-07433-RWS

VIRGINIA GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.
_______________________/

VIDEOTAPED DEPOSITION OF TONY FIGUEROA

Volume 2 of 2

Pages 158 - 258

Taken at the Instance of the Defendant

DATE: Friday, June 24, 2016

TIME: Commenced: 8:59 a.m.
Concluded: 1:22 p.m.

PLACE: Southern Reporting Company
B. Paul Katz Professional Center
(SunTrust Building)
One Florida Park Drive South
Suite 214
Palm Coast, Florida 32137

REPORTED BY: LEANNE W. FITZGERALD, FPR
Florida Professional Reporter
Court Reporter and Notary Public

1 A Yes.
2 Q All right. And that belief was based on
3 Virginia telling you that?
4 A And JJ and Michael.
5 Q Okay. So you had heard from some other
6 people, and then later --
7 A Yeah. Before she had come back to the
8 apartment, they said that she was a masseuse for
9 this guy. And then when she came back, she told me.
10 Q All right. Once you started dating her
11 again -- I'm sorry.
12 Prior to dating her. Go back to the first
13 time you were dating her. Did she have money?
14 A No.
15 Q All right. Was she able to afford her own
16 place?
17 A No.
18 Q Was she doing massages, at all?
19 A No.
20 Q All right. Fast forward to the second
21 time when you get back together with her sometime in
22 2001.
23 A Uh-huh (affirmative).
24 Q Did she appear to you to have any massage
25 training?

1 A No.
2 Q As a seventeen-year-old at that time, was
3 she able to afford things?
4 MS. MENNINGER: Objection. Form.
5 Foundation.
6 BY MR. EDWARDS:
7 Q Did she have money --
8 A She had money.
9 Q -- while working with Jeff?
10 And was the money in the form of cash?
11 A Yes.
12 Q And did she always have cash?
13 A Yes.
14 Q And how was the apartment paid for?
15 MS. MENNINGER: Objection. Form.
16 Foundation.
17 A Cash.
18 BY MR. EDWARDS:
19 Q And did you see how she was paying for the
20 apartment?
21 A I did not watch her pay the bill, but...
22 Q Okay. When you would go to dinner, who
23 would pay?
24 A Just whoever.
25 MS. MENNINGER: Objection. Form.

1 MS. MENNINGER: Objection. Form.
2 Foundation.
3 A For Jeffrey.
4 BY MR. EDWARDS:
5 Q All right. Let me fix this. Ghislaine --
6 when Ghislaine Maxwell would call you during the
7 time that you were living with Virginia, she would
8 ask you what, specifically?
9 MS. MENNINGER: Objection. Form.
10 Foundation.
11 A Just if I had found any other girls just
12 to bring to Jeffrey.
13 BY MR. EDWARDS:
14 Q Okay.
15 A Pretty much every time there was a
16 conversation with any of them, it was either asking
17 Virginia where she was at, or asking her to get
18 girls, or asking me to get girls.
19 Q All right. Let's go to that second
20 category you just identified, which is asking
21 Virginia to get girls. How many times were you in a
22 room where specifically Ghislaine Maxwell would ask
23 Virginia to bring girls?
24 A None that I can recall.
25 Q Okay. How many times -- when you say they

1 went with Virginia, and you dropped her off; and
2 some occasions you went inside?
3 A Yeah.
4 Q And some of the occasions you went inside,
5 you hung out by the pool?
6 A Yes.
7 Q Or in the kitchen with the chef?
8 A Yeah.
9 Q All right. And in the total of all the
10 times that you went inside the house, you saw
11 Ms. Maxwell -- I think you got up to six times?
12 A Yeah, about five or six times.
13 Q All right. Total?
14 A Total.
15 Q That's not five or six times where --
16 A That was period, all together.
17 Q -- you brought girls?
18 A No. All together, period.
19 Q All right. I thought you said when I was
20 asking you questions that Ms. Maxwell never asked
21 you to bring girls.
22 A I don't remember saying that.
23 Q Okay. Well, tell me. When did
24 Ms. Maxwell ask you to bring a girl?
25 A Never in person. It was, like, literally,

1 like, on the phone maybe, like, once or twice.
2 Q All right. Did Ms. Maxwell call you
3 frequently?
4 A No.
5 Q All right. How many times do you think
6 Ms. Maxwell called you, at all?
7 A I'd just say that probably a just a few, a
8 couple of times. Maybe once or twice.
9 Q One or two --
10 A The majority of the time it was pretty
11 much his assistant.
12 Q How do you know Ms. Maxwell's voice?
13 A Because she sounds British.
14 Q So someone with a British accent called
15 you once or twice and asked for --
16 A Well, she told me who she was.
17 Q Okay. And what did she say when she
18 called you and asked you to bring girls?
19 A She just said, "Hi. This is Ghislaine.
20 Jeffrey was wondering if you had anybody that could
21 come over."
22 Q Okay. When did that happen?
23 A I'm not exactly sure on the time frame.
24 Q Was it after the Roadhouse Grill or
25 before?

1 Q So the thing that Virginia was tired of --
2 just so that the record is clear -- well, I'll let
3 you answer in your words. Just be clear.
4 What was it that Virginia was trying to
5 get away from and stop with respect to working at
6 Jeffrey Epstein's house?
7 MS. MENNINGER: Objection. Form,
8 foundation -- as to Virginia's thought
9 processes.
10 A To stop being used and abused.
11 BY MS. MENNINGER:
12 Q How do you know that?
13 MS. MENNINGER: Objection. Form.
14 Foundation.
15 A Due to all the things that I have come
16 to -- that have been brought to light, and in the
17 experiences that I've had, and the conversations
18 that I have had with her. Like, it just all adds up
19 to that, so...
20 BY MS. MENNINGER:
21 Q When Virginia was wanting to get out, did
22 she ever express that it was the times of work that
23 she was trying to get away from?
24 A No.
25 Q Okay. What was she specifically

1 Q Was she getting paid as much as she was
2 getting paid to work for Jeff Epstein?
3 A Definitely not.
4 Q She no longer had cash all around?
5 A Nope.
6 Q You mentioned that there was -- you had
7 several conversations with Virginia when she was
8 discussing them wanting -- or I think the word you
9 used was force, but later we tried to clarify that,
10 but them forcing her to have sex with Prince Andrew.
11 Do you remember that?
12 A Yeah.
13 Q And that you expressed that you were
14 worried for her safety if she were to decline that?
15 A Yes.
16 Q What about your conversation with Virginia
17 on that particular occasion made you worried for
18 Virginia's safety?
19 A Just the way she was talking to me. Like,
20 she just sounded scared.
21 Q And what -- what -- try to dig back and
22 remember what exactly she was saying and how she was
23 saying it, if you could just describe that for us.
24 A She said that she went to go in -- I
25 remember at one time she was talking to me about how

1 CERTIFICATE OF REPORTER

2

STATE OF FLORIDA)
3)
COUNTY OF VOLUSIA)
4

5

6

7 I, Leanne W. Fitzgerald, Court Reporter, do hereby certify that I was authorized to and did
8 stenographically report the deposition of TONY FIGUEROA; and that the foregoing transcript is a
9 true record of my stenographic notes.

10 I further certify that I am not a relative, employee, attorney, or counsel of any of the
11 parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the
12 action, nor am I financially interested in the action.
13

Dated this 5th day of July, 2016.
14

15

16

17

18

19

20 Leanne W. Fitzgerald, FPR
Florida Professional Reporter
21

Digital Certificate Authenticated
22 By Symantec

23

24

25

EXHIBIT 5

(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE

05/03/2016

Agren Blando Court Reporting & Video, Inc.
216 16th Street, Suite 600
Denver Colorado, 80202
303-296-0017

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS &
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Appearing on behalf of the
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BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq. (For Portion)
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Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the
Plaintiff

1 APPEARANCES: (Continued)

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4 Denver, CO 80203
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5 lmenninger@hmflaw.com
jpagliuca@hmflaw.com
6 Appearing on behalf of the
Defendant
7
Also Present:
8 Brenda Rodriguez, Paralegal
Nicholas F. Borgia, CLVS Videographer
9
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1 you don't.
2 Do you have any reason to believe that any
3 of your previous sworn statements that you have made
4 are not true?
5 A No.
6 MR. EDWARDS: I just object and ask that
7 if we're going to ask the witness questions about any
8 of her statements in whole or in part that the
9 witness be allowed to see the statement, review the
10 statement and then answer your questions.
11 Q (BY MS. MENNINGER) You may answer the
12 question.
13 A Can you reask the question? I'm sorry.
14 Q Do you have any reason to believe that any
15 of your prior sworn statements are untrue?
16 A I have no reason to believe that my prior
17 statements are untrue.
18 Q Has anyone told you to say something that
19 was not true in connection with this case?
20 A No, ma'am.
21 Q All right. I'd like to start with a
22 lawsuit that you filed under the caption Jane Doe
23 versus Jeffrey Epstein.
24 Do you recall that lawsuit?
25 A I believe so.

1 (Exhibit 1 marked.)
2 Q (BY MS. MENNINGER) I'm going to show you
3 an exhibit that we are marking as Defendant's
4 Exhibit 1.
5 MR. EDWARDS: Can I see that for a second?
6 I'd just like to make an objection on the
7 record for the misidentification of this document.
8 While there was a lawsuit filed under the
9 style of Jane Doe versus Jeffrey Epstein, Jane Doe
10 was not Virginia Giuffre. And the lawsuit that's now
11 being handed to this witness is Jane Doe 102 versus
12 Jeffrey Epstein.
13 Is that the document we're talking about?
14 MS. MENNINGER: Counsel, if you have an
15 objection, you should state the basis for your
16 objection in a non-leading, non-suggestive manner.
17 If you have any other record to make, you
18 can do so in a pleading filed with the Court.
19 MR. EDWARDS: Sure. My objection is
20 you've misrepresented what you've handed the witness.
21 I want to make sure that the witness is holding what
22 you actually want her to be holding as opposed to the
23 lawsuit you said that you were going to hand her.
24 That's it.
25 MS. MENNINGER: Counsel, I will ask the

1 January 19th, 2015?
2 A At the very top of the page it says
3 January 21st, 2015.
4 Q The date it was filed. Is there a date
5 just above the signature block?
6 A Oh, yes, sorry. Yes, there is.
7 Q And what date -- what date was that?
8 A The 19th day of January, 2015.
9 Q Okay. And this document is something that
10 you believe contains the truth, correct?
11 A To the best of my knowledge at the time,
12 yes.
13 Q All right. Did something change between
14 the time then and today that makes you believe that
15 it's not all accurate?
16 A Well, as you can see, in line 4 on page 1,
17 I wasn't aware of my dates. I was just doing the
18 best to guesstimate when I actually met them.
19 Since then I've been able to find out that
20 through my Mar-a-Lago records that it was actually
21 the summer of 2000, not the summer of 1999.
22 Q Oh, I'm sorry. Are you back on page 1?
23 A On the first page.
24 Q Okay.
25 A Yes.

1 MR. EDWARDS: Objection. Asked and
2 answered.
3 Q (BY MS. MENNINGER) You may answer.
4 MR. EDWARDS: Answer again.
5 A Again, I wouldn't say it's untrue. Untrue
6 would mean that I would have lied. And I didn't lie.
7 This was my best knowledge at the time. And I did my
8 very best to try to pinpoint time periods going back
9 such a long time ago.
10 It wasn't until I found the facts that I
11 worked at Mar-a-Lago in 2000 that I was able to
12 figure that out.
13 Q (BY MS. MENNINGER) And approximately when
14 did you learn those facts about the dates you worked
15 at Mar-a-Lago?
16 A I would say it was mid-2015.
17 Q Mid-2015 is the first time you became
18 aware of the dates --
19 A I don't know the exact --
20 Q If you could just let me finish.
21 A I'm sorry.
22 Q That's all right. Approximately mid-2015
23 when you learned the true dates that you had worked
24 at Mar-a-Lago?
25 A That's correct. Sorry.

1 MR. EDWARDS: Object to the form.
2 A Uhm, I don't know, to be honest.
3 Q (BY MS. MENNINGER) And in what order did
4 Taco Bell, Publix and Mar-a-Lago go, and the aviary,
5 sorry?
6 A Oh, I would have to guess. Do you want me
7 to guess?
8 Q Sure.
9 A Um, I would say Publix. And then, I think
10 that's when I helped my boyfriend out at Taco Bell
11 and then I think the aviary.
12 Q And where was the Taco Bell?
13 A I was living in Fort Lauder -- I think it
14 was Fort Lauderdale. Don't quote me on that, but
15 somewhere in Florida, Broward County, something like
16 that.
17 Q And who were you living with at that time?
18 A Michael. His name is James, but Michael.
19 Q So you were living with Michael when you
20 worked at the Taco Bell, right?
21 A Yes, I was living with him.
22 Q And you worked with Michael when you
23 worked at the Publix, correct?
24 A No.
25 Q Okay. So Publix came after Taco Bell or

1 Q Whatever address you were living at, at
2 the time you started at Mar-a-Lago.
3 A [redacted] Loxahatchee, Florida
4 33470.
5 Q How is it that you came to work at
6 Mar-a-Lago?
7 A My dad is a maintenance manager or
8 supervisor, I don't know what you call it. But he
9 worked in the maintenance department, mostly on
10 tennis courts, working on the air conditioning,
11 helping set up for functions. And he got me a summer
12 job there.
13 Q Okay. And you said you were on a break?
14 A Yes.
15 Q What were you on a break from?
16 A I think like -- this is going back so long
17 now, but I was attempting to get my GED. And it,
18 summer came, so school stops during the summertime
19 here in America, and I got a summer job.
20 Q All right. And where were you in school?
21 A I don't actually know the name of the
22 place. It's -- yeah, I know.
23 Q A GED place?
24 A Yeah, it was, like, I was previously in
25 Royal Palm Beach High School, but, I mean, because of

1 Q Okay. If I can direct your attention back
2 to Defendant's Exhibit 12 at page 15. And under the
3 heading Response to Interrogatory Number 9, do you
4 see that where it says --
5 A Yes.
6 Q -- Ms. Joffrey (pronouncing) -- Giuffre,
7 excuse me, responds as follows?
8 A Yes.
9 Q Okay. It says you worked as a locker room
10 attendant for the spa area, correct?
11 A Yes.
12 Q And it says records produced in this case
13 identify the date of employment as 2000, correct?
14 A Yes.
15 Q What records that were produced in this
16 case cause you to believe that the employment began
17 in 2000?
18 A Uhm, is this going back to another
19 question that I'm not allowed to answer?
20 Q No.
21 A I have seen the documents, and I know that
22 my employment now was in 2000.
23 Q What documents did you see that caused you
24 to make that answer?
25 A The Mar-a-Lago employment documents.

1 masseuses had their own uniforms.
2 Q What did the masseuses' uniform look like?
3 A I don't remember.
4 Q No recollection at all?
5 A None whatsoever.
6 Q Color?
7 A No, sorry. I remember mine.
8 Q Okay. How did it come to pass that you
9 were no longer working at Mar-a-Lago in two to three
10 weeks?
11 A I was approached by Ghislaine Maxwell.
12 Q Okay. And how long had you been working
13 at Mar-a-Lago when you were approached by Ghislaine
14 Maxwell?
15 A Roughly two to three weeks.
16 Q Okay. Where in the spa were you when you
17 were approached by Ghislaine Maxwell?
18 A Just outside the locker room, sitting
19 where the other girl that works there usually sits.
20 She was away from the desk. I was reading a book on
21 massage therapy.
22 Q Was that indoors or outdoors?
23 A Outdoors.
24 Q Okay. And what -- were you in the sun or
25 in the shade?

1 wanted to aim for something higher than being a
2 locker room attendant one day. And. Yeah.
3 Q What was the name of the massage therapist
4 that you were speaking with?
5 A Oh, I have no idea.
6 Q Can you give me any physical description
7 of any of them?
8 A Um, there was one who had blonde short
9 hair. There was -- I would say there's probably
10 about four massage therapists that work in there.
11 So, I mean, I don't remember all of them.
12 Q Okay. What time of day was it?
13 MR. EDWARDS: Object to the form.
14 A Afternoon.
15 Q (BY MS. MENNINGER) How late?
16 A Anywhere between 2 to 4.
17 Q And what time did you get off of work?
18 A I believe I got off at 5.
19 Q And what was the rest of your conversation
20 with Ms. Maxwell?
21 I'm sorry, I don't think you finished.
22 A Thank you. Well, she noticed I was
23 reading the massage book. And I started to have
24 chitchat with her just about, you know, the body and
25 the anatomy and how I was interested in it. And she

1 told me that she knew somebody who was looking for a
2 traveling masseuse.
3 And I said, Well, I don't have any
4 accreditations. This is the first book I've ever
5 read. She goes, That's okay. I know somebody. We
6 can train you. We can get you educated. You know,
7 we can help you along the way if you pass the
8 interview.
9 If the guy likes you, then, you know, it
10 will work out for you. You'll travel. You'll make
11 good money. You'll be educated, and you'll finally
12 get accredited one day.
13 Q Okay.
14 A She finished off by, you know, giving me
15 her number. And I told her I'd have to ask my dad.
16 And I called my dad. I ran over, actually, to see my
17 dad, talked to him. He said it would be okay. I
18 used the phone from Mar-a-Lago to call her and tell
19 her that I was allowed to come over.
20 And she said, Great. Meet me here at -- I
21 don't remember the exact address, but it was
22 El Brillo Way in Palm Beach -- after you get off.
23 And my dad drove me.
24 Q Did you write down her add -- the address
25 that she gave?

1 A Yes.
2 Q Did you write down her phone number?
3 A Yes.
4 Q So did you go run and talk to your dad
5 while she was still there?
6 A No, I believe she left. And she told me
7 to ask my dad and then to give her a phone call.
8 Q Okay. Did she ask you your age when she
9 had that conversation with you?
10 A No, she did not.
11 Q Did you tell her your age?
12 A No, I did not.
13 Q And so somewhere you wrote down a phone
14 number to call her back at?
15 A Um-hum.
16 Q All right. And where did you write that
17 down?
18 A Probably just a piece of paper lying
19 around the desk.
20 Q Okay. But you don't remember?
21 A I mean, no, I don't have that piece of
22 paper anymore, so no.
23 Q Okay. And did you write down an address?
24 A Yes.
25 Q And what number do you think you called?

1 Q When did you get your first car?
2 A After my trip to London to meet Prince
3 Andrew.
4 Q Okay. What kind of car did you get?
5 A A Dodge Dakota.
6 Q And did you purchase that yourself?
7 A Yes, I did.
8 Q And how much did it cost?
9 A I don't remember off the top of my head
10 how much it cost.
11 Q Who did you buy it from?
12 A My dad helped me bargain with it. I don't
13 remember where we bought it from.
14 Q And was the title put in your name or your
15 dad's name?
16 A I think the title was put in my name. I
17 think. I mean, my dad was with me. I've never
18 registered a car or anything like that before. So --
19 Q So that was your first time?
20 A Yes.
21 Q Memorable, right?
22 A Yes.
23 Q When you got there, a butler or someone
24 answered the door, is that what you said?
25 A No, Ghislaine answered the door.

1 A Yes.

2 Q Who else was at home when you got home?

3 A My mom, my dad and my brother.

4 Q Which brother?

5 A Sky.

6 Q And anyone else who was there at the time?

7 A I believe Michael might have been living

8 with me at that time. So he might have been there.

9 Q Do you recall if he was there when you got

10 home?

11 A I don't really remember. I remember what

12 I did when I got home, that I basically made a

13 beeline for the bathroom.

14 Q Let me ask you a question. Michael was

15 living with you at that home, at your parents' home

16 at the time, is your best recollection today; is that

17 right?

18 A That's my best recollection, yes.

19 Q When you say living with you, were you

20 guys staying in the same room?

21 A Yes.

22 Q Were you engaged at that time to him?

23 A That was a really weird relationship. He

24 was a friend who looked after me, and he did propose

25 to me and I did say yes. But my heart was never in

1 it.

2 He was somebody that helped me off the

3 streets so I felt compelled to say yes to him.

4 Q Okay. So when he proposed to you and you

5 said yes, did that take place before you started

6 working at Mar-a-Lago or after you started working at

7 Mar-a-Lago?

8 A Before.

9 Q And so if he were living with your parents

10 at that time, you were living in the same room; is

11 that correct?

12 A I believe so.

13 Q And your parents understood him to be your

14 fiance?

15 A I don't think they agreed with it, but I

16 think they understood it as that. I mean --

17 Q I mean, you communicated to them that he

18 had proposed and you had accepted?

19 A Yeah, in not such a pretty way. I mean,

20 they obviously weren't very happy about it. And it

21 wasn't my true intentions to ever marry him.

22 Q Okay.

23 A But I did it to make him feel okay. I

24 didn't want to be mean.

25 Q What did your mom say about your

1 A I believe Juan Alessi was pretty much
2 within ear distance.
3 Q Could you see him?
4 A Yes.
5 Q Okay.
6 A Like I said, in ear distance, when I mean
7 ear distance like hearing, in the hearing vicinity.
8 And it was in the same time that she was asking him
9 to drop me off at home.
10 Q Okay. When you were driving home the
11 first night with Juan Alessi, did you have any
12 conversation with him?
13 A No. I had told him my address. It was a
14 very quiet ride.
15 Q Did you ride in the front or the back?
16 A The front.
17 Q It is your contention that, Ghislaine
18 Maxwell had sex with underage girls virtually every
19 day when I was around her, correct?
20 A Yes.
21 Q All right. With whom did Ghislaine
22 Maxwell have sex in your presence?
23 A Well, there's a lot of girls that were
24 involved. We weren't on a first name basis with each
25 other. I wouldn't be able to give you lists of names

1 of girls. It was continuous.
2 Q It was continuous. Name one girl that
3 Ghislaine Maxwell had sex with in your presence.
4 A Emmy Taylor. I mean, that's a name that I
5 know well because Emmy was always around.
6 I'm trying to think of her name, sorry.
7 Sarah. Her name used to be Sarah Kellen. I think
8 she's changed it now that she's married.
9 [redacted] (phonetic) -- I can't
10 pronounce her last name properly, but it's around
11 those lines.
12 There were a lot of other girls that I
13 honestly can't remember their names. I'm sorry. I
14 wish I could help out more because I really would
15 like to provide more witnesses for this, but I can't
16 remember a lot of girls' names.
17 Q So those are the three names of females
18 that you observed Ghislaine Maxwell have sex with --
19 MR. EDWARDS: Object to the form.
20 Mischaracterizes testimony.
21 Q (BY MS. MENNINGER) -- is that what I
22 understand your answer to be?
23 MR. EDWARDS: Objection. Mischaracterizes
24 her testimony.
25 A Those are -- those are some three of the

1 Q More than 20?
2 A I would say more than 20.
3 Q More than 50?
4 A I don't think more than 50, but --
5 Q Did --
6 A I don't have an exact number. I mean,
7 if -- I think if you look at the flight logs, you
8 know, that helps, but then they're not fully
9 complete. We only have flight logs to one plane and
10 then there's a time I was flown commercially into the
11 island.
12 Q Um-hum.
13 A So it's really hard for me to gauge a
14 number.
15 Q Okay. Do you have any photographs of
16 yourself on the island?
17 A I know I used to, but they would be left
18 in that apartment.
19 Q What other locations did you participate
20 in sexual contact with Ghislaine Maxwell, other than
21 the island?
22 A Everywhere. New York, Palm Beach.
23 Q Where in New York?
24 A The mansion, Jeffrey's mansion.
25 Q Okay. Anywhere else in New York?

1 think I met Prince Andrew in 2001. And Glenn Dubin
2 and Stephen Kaufmann were, like I said, the first
3 people I was sent out to after my training. So I
4 don't know. I'm not going to give you an exact time
5 if I don't know it.
6 Q I asked you the relative order.
7 A And I'm trying to give you it.
8 Q And where does Alan Dershowitz fit into
9 that group of people?
10 A Same. I can't tell you piece by piece by
11 piece who -- I know Glenn Dubin was first.
12 Q Okay.
13 A And I know Stephen Kaufmann was one of the
14 first I was sent to. Alan Dershowitz could have been
15 between there. Between, sorry, between Glenn and
16 Stephen. The first time I was with Alan Dershowitz
17 was in New York, so I wasn't actually sent to him.
18 It actually happened at one of Jeffrey's residences.
19 (Ms. McCawley left the deposition.)
20 A So it's very hard for me to
21 chronologically give you each person individually.
22 Q (BY MS. MENNINGER) Okay. Name the other
23 politically connected and financially powerful people
24 that Ghislaine Maxwell told you to go have sex with?
25 A Again, I'm going to tell you "they"

1 because that's how it went. They instructed me to go
2 to George Mitchell, Jean Luc Brunel, Bill Richardson,
3 another prince that I don't know his name. A guy
4 that owns a hotel, a really large hotel chain, I
5 can't remember which hotel it was. Marvin Minsky.
6 There was, you know, another foreign
7 president, I can't remember his name. He was
8 Spanish. There's a whole bunch of them that I
9 just -- it's hard for me to remember all of them.
10 You know, I was told to do something by these people
11 constantly, told to -- my whole life revolved around
12 just pleasing these men and keeping Ghislaine and
13 Jeffrey happy. Their whole entire lives revolved
14 around sex.
15 They call massages sex. They call
16 modeling sex. They call --
17 Q I asked you the names for people. Are you
18 going to tell me any other names or is that all of
19 them?
20 A I'm trying to think. That's the answer
21 I'm trying to give to you. It's that it's so hard to
22 just keep naming and naming and naming.
23 Q All right.
24 A A lot of times I would be introduced to
25 them. I didn't know --

1 many times you want me to keep answering this
2 question. Both told me to do this, okay? They both
3 sent me to these people.
4 How many times do you want me to answer
5 this?
6 Q (BY MS. MENNINGER) I think you're
7 answering a different question so that's why I'm
8 going to ask you again. I am not asking you anything
9 about a time when Jeffrey and Ghislaine together told
10 you to go do something. I'm asking you to name a
11 single time during which Ghislaine Maxwell acting
12 alone directed you to go have sex with another
13 person?
14 MR. EDWARDS: Objection. Asked and
15 answered. Harassing. Argumentative.
16 A I've given you the names of the people
17 that Ghislaine instructed me to go have sexual
18 relations with. I am not discluding (sic) the fact
19 that Jeffrey also told me.
20 Ghislaine told me from her mouth to do
21 these things. Jeffrey told me from his mouth to do
22 these things with these people. Ghislaine instructed
23 me to do the things that I did with Jeffrey Epstein
24 on the very first meeting that I had with him. She
25 brought me there under the preclusion (sic) that I

1 was going to be trained as a masseuse and that she
2 instructed me to take off my clothes and to give oral
3 sex to Jeffrey Epstein.
4 Q (BY MS. MENNINGER) Excuse me. I've asked
5 you for the names.
6 A I've just given you a name. Jeffrey
7 Epstein is a big name.
8 Q All right.
9 A She instructed me on that one.
10 Q So you're saying --
11 MR. EDWARDS: The witness is finishing her
12 answer right now. She's in the process of explaining
13 one of the people Ghislaine told her to have sex
14 with.
15 Q (BY MS. MENNINGER) So you're saying
16 Ghislaine Maxwell directed you to have sex with
17 Jeffrey Epstein?
18 A Correct.
19 Q Ghislaine Maxwell directed you to have sex
20 with Glenn Dubin?
21 A Correct.
22 Q What words did Ghislaine Maxwell tell you
23 to go have sex with Glenn Dubin?
24 A It was the same all the time, all right?
25 They want me to go provide these men with a massage.

1 A When it happened?
2 Q When Ghislaine Maxwell used the words, Go
3 give a massage to Bill Richardson, where were you?
4 MR. EDWARDS: Object to the form.
5 Mischaracterizes her testimony.
6 A I can't tell you where we were. I know
7 where I was sent to. I don't know where we were when
8 she told me to do that.
9 Q (BY MS. MENNINGER) Where were you sent
10 to --
11 A New Mexico.
12 Q -- by Ghislaine Maxwell?
13 MR. EDWARDS: Object to the form.
14 Mischaracterizes her testimony again.
15 A Are you smiling at me because --
16 Q (BY MS. MENNINGER) No, I'm asking you to
17 answer the question.
18 A I have answered the question. I was sent
19 to New Mexico.
20 Q Okay. Where were you sent from?
21 A I already answered that. I don't know
22 where I was sent from.
23 Q Okay.
24 A I was flying everywhere with these people.
25 Q Where were you sent by Ghislaine Maxwell

1 A No, she was not in the room. She was in
2 another cabana.
3 Q And other than telling you to go give the
4 owner of this large hotel chain a massage, do you
5 remember any other words she used to you to direct
6 you in what you should do?
7 A Not at the time, no.
8 Q Where did -- where were you and where was
9 Ms. Maxwell when she directed you to go have sex with
10 Marvin Minsky?
11 MR. EDWARDS: Object to the form.
12 A I don't know.
13 Q (BY MS. MENNINGER) Where did you go to
14 have sex with Marvin Minsky?
15 A I believe it was the U.S. Virgin Islands,
16 Jeff's -- sorry, Jeffrey Epstein's island in the U.S.
17 Virgin Islands.
18 Q And when was that?
19 A I don't know.
20 Q Do you have any time of year?
21 A No.
22 Q Do you know how old you were?
23 A No.
24 Q Other than Glenn Dubin, Stephen Kaufmann,
25 Prince Andrew, Jean Luc Brunel, Bill Richardson,

1 another prince, the large hotel chain owner and
2 Marvin Minsky, is there anyone else that Ghislaine
3 Maxwell directed you to go have sex with?
4 A I am definitely sure there is. But can I
5 remember everybody's name? No.
6 Q Okay. Can you remember anything else
7 about them?
8 A Look, I've given you what I know right
9 now. I'm sorry. This is very hard for me and very
10 frustrating to have to go over this. I don't -- I
11 don't recall all of the people. There was a large
12 amount of people that I was sent to.
13 Q Do you have any notes of all these people
14 that you were sent to?
15 A No, I don't.
16 Q Where are your notes?
17 A I burned them.
18 Q When did you burn them?
19 A In a bonfire when I lived at Titusville
20 because I was sick of going through this shit.
21 Q Did you have lawyers who were representing
22 you at the time you built a bonfire and burned these
23 notes?
24 A I've been represented for a long time, but
25 it was not under the instruction of my lawyers to do

1 this. My husband and I were pretty spiritual people
2 and we believed that these memories were worth
3 burning.
4 Q So you burned notes of the men with whom
5 you had sex while you were represented by counsel in
6 litigation, correct?
7 MR. EDWARDS: Object to the form.
8 A This wasn't anything that was a public
9 document. This was my own private journal, and I
10 didn't want it anymore. So we burned it.
11 Q (BY MS. MENNINGER) When did you write
12 that journal?
13 A Just over time. I started writing it
14 probably in, I don't know, I can't speculate, 2012,
15 2011.
16 Q So you did not write this journal at the
17 time it happened?
18 A No.
19 Q You started writing this journal
20 approximately a decade after you claim you finished
21 being sexually trafficked, correct?
22 A Yes.
23 Q And you started writing a journal after
24 you had a lawyer, correct?
25 A Correct.

1 THE VIDEOGRAPHER: We're back on the
2 record at 2:55.
3 Q (BY MS. MENNINGER) Do you have any
4 photographs of yourself either nude or in a sexually
5 compromising position that you claim were taken by
6 Ghislaine Maxwell?
7 A I do not have any of those in my evidence.
8 But if you ask Ghislaine Maxwell, she would have
9 plenty.
10 Q Do you have any in your storage boxes in
11 Sydney?
12 A No.
13 Q Do you know whether your attorneys have
14 any such photographs that you claim were taken by
15 Ghislaine Maxwell?
16 A No.
17 Q You don't know or they don't have them?
18 A I don't know. And I don't think they have
19 them. If they had them, they would have told me.
20 You should ask your client. She's got plenty of
21 them.
22 Q What type of camera did Ghislaine Maxwell
23 use?
24 A It was a black camera. And it had a, I
25 don't know the types and names of them, but the lens

1 that goes out.

2 Q Was it digital or single reflex?

3 A Again, I don't know types of cameras. I

4 mean, I use my phone for using a camera. So it's a

5 black camera and it had a lens that you could put out

6 further or bring back.

7 Q Did you ask her to take any photographs of

8 you?

9 A No. She asked to take photographs of me.

10 Q Was it a film or a digital camera?

11 A I never saw how she printed them out.

12 Q What's the first time you told anybody

13 that you had been sexually trafficked?

14 MR. EDWARDS: Form.

15 A Tony Figueroa, my ex-boyfriend, knew some

16 of the stuff that was happening, though I did not go

17 in great detail to him, being that he's my boyfriend.

18 And then the first person I really opened up to about

19 everything was my husband.

20 Q (BY MS. MENNINGER) Did you tell Tony

21 Figueroa that you were forced to have sex with

22 Jeffrey Epstein?

23 A Yes.

24 Q Did you tell Tony Figueroa you were forced

25 to have sex with Ghislaine Maxwell?

1 any interactions with law enforcement?
2 A Yes.
3 Q When?
4 A When I tried to break away from Jeffrey
5 and Ghislaine, I started making myself unavailable.
6 And I got a job at Road House Grill. And Tony used
7 to come pick me up in the afternoons, at nighttime,
8 and he'd sit at the bar. And there's this big cup
9 that's got tips in it.
10 I was in the back room. And I had to --
11 first you have to sign out and you have to take off
12 your aprons, put your aprons away. And there's a
13 whole bunch of cleaning up stuff you have to do.
14 In that time period, Tony grabbed money
15 from a cup that had money in it. That was for the
16 bartenders for their tips. My boss called me the
17 next day. He told me that I had stolen the money,
18 which I hadn't. And I came back and I returned the
19 money after I confronted Tony about it. Gave the
20 money back to him and he said, I'm sorry, but it's
21 just law that I have to call the police. So he
22 called the police.
23 And knowing that Jeffrey has got the Palm
24 Beach Police Department in his pocket, I went to
25 Jeffrey Epstein and I told him what had happened.

1 And Jeffrey said, Don't worry about it. Let me take
2 care of it for you.
3 Q Okay. I'm sorry. When did you have
4 interaction with law enforcement, then?
5 A What year?
6 Q Did you speak with a law enforcement
7 officer?
8 A I don't believe I spoke to them. Jeffrey
9 handled everything.
10 Q Okay. And you said that you had finished
11 your shift at -- this is at the Road House Grill,
12 correct?
13 A Correct.
14 Q You had finished your shift?
15 A Yeah, it was the end of the shift.
16 Q Okay. And you had cleaned up and were
17 checking out, correct?
18 A Yeah, it's a completely separate part of
19 the -- it's like back of the house. Do you know what
20 that means, like in waitering terms?
21 Q (Indicating.)
22 A Yeah, back of the house.
23 Q And what was -- who was this boss that you
24 spoke to?
25 A I can't remember his name.

1 exclusivity?
2 A Yes.
3 Q What was that period?
4 A I believe it was like a three-month period
5 or something.
6 Q Okay. And what other terms of the
7 contract, do you recall?
8 A I couldn't talk to any other news
9 publication about the story.
10 Q Anything else?
11 A Not that I know of.
12 Q Were you happy when the period was up?
13 A Well, I mean, at that time I wanted to
14 write about my story. So I guess, yes, I was happy
15 when that period was up.
16 Q And you were actively writing a book at
17 that time, correct?
18 A My manuscript. I've never published it.
19 Q You were writing the manuscript at the
20 time of your period of exclusivity with Sharon
21 Churcher, correct?
22 A Those three months were just craziness. I
23 think I started after that.
24 Q You think you started writing the book
25 after the 90 days were up?

1 A Yeah.
2 Q And then you attempted to sell that
3 manuscript, correct?
4 A I didn't attempt to sell it. I went to
5 other publications, like, what do you call them?
6 People -- I'm trying to think of the name of the
7 word. People who publish books, not like a newspaper
8 or anything. And I inquired about what they thought
9 of my manuscript and if they thought it was, you
10 know, a good story. And, yeah.
11 Q So you sent the manuscript to these people
12 for the purposes of trying to publish the book,
13 correct?
14 A Some people, yes.
15 Q And you were trying to get money from the
16 book publication, correct?
17 A Well, I wasn't going to sell it to them
18 for free.
19 Q But you were unsuccessful in finding
20 someone to publish it, correct?
21 A Well, I was always on the fence with it.
22 I wasn't too sure if I wanted to or didn't want to.
23 I was more seeking judgment based upon these people
24 who have done this plenty and plenty of times.
25 Still to this day, I mean, I've had people

1 who have been interested in it and I still don't know
2 if I want to do it yet. I mean, I think there's a
3 lot more that can go into it, you know.
4 Q You were actively sending the manuscript
5 to people for purposes of having them reach a deal
6 with you and publish it, correct?
7 A No deal was ever talked about. What we
8 talked about was the possibility of publishing it, is
9 it publishing-worthy, would I need to get a
10 ghostwriter. You know, this is the first time I've
11 ever written a manuscript so I didn't know what I was
12 doing.
13 Q Okay. You contacted Jarred Weisfeld,
14 correct?
15 A Correct.
16 Q I'm going to mark a document as
17 Defendant's Exhibit 16. It is a composite exhibit.
18 (Exhibit 16 marked.)
19 MR. EDWARDS: Thank you.
20 Q (BY MS. MENNINGER) I'm not going to ask
21 you to read every single page of this, but if you
22 look at the first page.
23 A Um-hum.
24 Q Can you tell what this is in terms of what
25 type of document?

1 calm the anxiety and everything down.
2 Q Before you met Jeffrey Epstein, had you
3 used any drugs?
4 A Sure, yes.
5 Q Which drugs had you used prior to meeting
6 Jeffrey Epstein?
7 A I smoked pot. I've taken Ecstasy.
8 Q Cocaine?
9 A Yeah, I would have snorted cocaine,
10 um-hum.
11 Q Did you ever abuse alcohol before meeting
12 Jeffrey Epstein?
13 A No, I was -- I wasn't even of age to be
14 able to buy it. I mean, if there was alcohol at
15 parties I would have drank it, but I wouldn't say I
16 abused it.
17 Q Okay. Were there ever occasions upon
18 which you were observed to be drunk by other people,
19 prior to meeting Jeffrey Epstein?
20 A If you're drinking, the possibility of
21 getting drunk is always there. I don't -- I can't
22 recall exact situation where that was the case,
23 but --
24 Q Were you diagnosed as a drug addict prior
25 to meeting Jeffrey Epstein?

1 AGREN BLANDO COURT REPORTING & VIDEO, INC.
216 - 16th Street, Suite 600
2 Denver, Colorado 80202
4450 Arapahoe Avenue, Suite 100
3 Boulder, Colorado 80303

4 May 11, 2016

5 Sigrid S. McCawley, Esq.
BOIES, SCHILLER & FLEXNER LLP
6 401 East Las Olas Boulevard
Suite 1200
7 Fort Lauderdale, FL 33301-2211

8 Re: Videotaped Deposition of VIRGINIA GIUFFRE
Giuffre v. Maxwell
9 Case No. 15-cv-07433-RWS

10 The aforementioned deposition is ready for reading
and signing. Please attend to this matter by
11 following BOTH of the items indicated below:

12 Call 303-296-0017 and arrange with us to read
and sign the deposition in our office.
13
XXX Have the deponent read your copy and sign
14 the signature page and amendment sheets, if
applicable; the signature page is attached.
15
Read the enclosed copy of the deposition and
16 sign the signature page and amendment
sheets, if applicable; the signature page is
17 attached.

18 XXX WITHIN 30 DAYS OF THE DATE OF THIS LETTER

19 By due to a trial date of

20 Please be sure the original signature page and
amendment sheets, if any, are SIGNED BEFORE A NOTARY
21 PUBLIC and returned to Agren Blando for filing with
the original deposition. A copy of these changes
22 should also be forwarded to counsel of record.
Thank you.
23
AGREN BLANDO COURT REPORTING & VIDEO, INC.
24

25 cc: All Counsel

GIUFFRE

VS.

MAXWELL

Deposition

VIRGINIA GIUFFRE VOLUME II

11/14/2016

Agren Blando Court Reporting & Video, Inc.
216 16th Street, Suite 600
Denver Colorado, 80202
303-296-0017

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq.
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Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.
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6 Appearing on behalf of the
Defendant
7
Also Present:
8 Ann Lundberg, Paralegal
Maryvonne Tompkins, Videographer
9
10
11
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1 A Yes.
2 Q And you believe the Neiman Marcus was
3 located in which city?
4 A Well, it's around Fort Lauderdale. I
5 can't tell you exactly. Fort Lauderdale is so big,
6 like Broward County? Is that the word for it?
7 Q And what did you do at Neiman Marcus?
8 A I worked in the changing rooms.
9 Q And what did you do in the changing room?
10 A I think I just like -- if I remember
11 right, I just put clothes away that people left in
12 there. Probably went out to get sizes, different
13 sizes for women who wanted different sizes of the
14 same product.
15 Q And where did you work after Neiman
16 Marcus?
17 A Taco Bell.
18 Q Did you work at Southeast Employee
19 Management Company?
20 A I don't recognize that. I don't know if
21 that's a payroll company or what it is. I don't know
22 what Southeast -- what is it called?
23 Q Southeast Employee Management Company.
24 A No, I don't remember that.
25 Q Did you ever work as a temp?

1 A Not that I remember.
2 Q Going to different offices and filling in?
3 A No.
4 Q Did you work for Oasis Outsourcing?
5 A I don't -- I don't know if that's a
6 payroll company or if that's an actual place, but
7 that doesn't ring a bell.
8 Q Did you -- do you know how much you got
9 paid when you were working at places like Oasis
10 Outsourcing?
11 A Well, considering I don't know if I worked
12 at Oasis Outsourcing, I wouldn't even know how much I
13 got paid.
14 Q Did you review your Social Security
15 records?
16 A Yes.
17 Q You saw Oasis Outsourcing listed there?
18 A Right, but like I said, it doesn't even
19 ding a bell at all.
20 Q Do you know how much money they said you
21 made from them?
22 MS. MCCAWLEY: Objection. If you want to
23 show her the documents, she can see what amount is
24 listed and answer your questions, but if you're not
25 going to show her the document, that's the best she

1 can do.

2 A Yeah, if you could. I'm happy to answer

3 your questions. I want to be helpful, so...

4 Q (BY MS. MENNINGER) Great. Well, do you

5 remember how much money you made from Oasis

6 Outsourcing?

7 A Like I said, I don't even remember working

8 for Oasis Outsourcing, or what it is, so I couldn't

9 tell you.

10 Q Do you remember how much money you were

11 making per hour at Neiman Marcus?

12 A No, not off the top of my head.

13 Q Do you know how many months you worked

14 there?

15 A Not long. I'd probably say -- I mean, I

16 don't know. I'm not going to guess. But around the

17 three-month mark would be my -- I don't know the

18 exact answer.

19 Q Do you remember any of your coworkers?

20 A No.

21 Q Did you work at Mannino's?

22 A Briefly, yes.

23 Q What is Mannino's?

24 A A cute little Italian restaurant in

25 Wellington.

1 Q And what did you do at Mannino's?
2 A I did waitressing.
3 Q And how much did you make?
4 A Oh, I don't know. I don't remember.
5 Q Did you work at TGI Fridays?
6 A Again, very shortly. Short time period,
7 and I was a waitress again.
8 Q And how much did you make there?
9 A I have no idea.
10 Q Did you get fired?
11 A No.
12 Q Why did you leave?
13 A I was -- that's around the time period
14 that I was approached by -- I can't remember his
15 name, but he owned a veterinary clinic or he was a
16 vet, one of the two, and he offered me to come work
17 for him.
18 Q When you were working at TG -- TGI
19 Fridays, were you also working at the Roadhouse
20 Grill?
21 A No.
22 Q Those were not at the same time?
23 A I don't know. I don't think so. Maybe
24 consecutively like after each other.
25 Q Do you recall working at the Roadhouse

1 Grill?
2 A Yes.
3 Q And why did you leave there?
4 A We all know that the thing that went down
5 there. Tony picked me up and took some money out of
6 a jar, and then I went to go give it back to the guy,
7 thinking that it would be all right, and it wasn't.
8 So I got fired, I think.
9 Q Sure. Okay. I show you some -- are we on
10 9?
11 MR. PAGLIUCA: Yes, 9.
12 Q (BY MS. MENNINGER) I'd like to show you
13 Defendant's Exhibit 9.
14 (Exhibit 9 marked.)
15 THE DEPONENT: Thank you.
16 Q (BY MS. MENNINGER) Do you recognize your
17 handwriting on this document?
18 A Yes.
19 Q Did you fill out an application for
20 employment --
21 A Yes.
22 Q -- on March 26th of 2002?
23 A Yes.
24 Q And where were you living at that time?
25 A I've put down my parents' address, but I

1 and seasonal employee, correct?
2 A Correct.
3 Q And your dad was a full-time year-round
4 employee, right?
5 A Yes.
6 Q He worked there all the time.
7 A Yes.
8 Q And your job was a seasonal employment.
9 A Well, as far as I know --
10 MS. MCCAWLEY: Objection.
11 A -- I was hired for the summer, so...
12 Q (BY MS. MENNINGER) Right. Okay. So the
13 work hours, in the next paragraph, what -- what is
14 that -- can you just read that bottom paragraph for
15 us?
16 A "The Club never shuts down from
17 November 1st to Mother's Day; for 24 hours a day, 7
18 days a week, it serves the diverse needs of our
19 members. Therefore to ensure the adequate coverage
20 at all times, departments have arranged different
21 schedules for their employees."
22 Q Okay. I'm going to show you Defendant's
23 Exhibit 20.
24 A Close this one?
25 Q Yeah.

1 STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)
4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.
9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.
14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.
18 In witness whereof, I have affixed my
19 signature this 23rd day of November, 2016.
20 My commission expires September 3, 2018.
21
22
Pamela J. Hansen, CRR, RPR, RMR
23 216 - 16th Street, Suite 600
Denver, Colorado 80202
24
25

EXHIBIT 6

(Filed Under Seal)

1 IN THE HIGH COURT OF JUSTICE
QUEEN'S BENCH DIVISION
2
3 Claim No. CR 2016 624
4 BETWEEN:
5 VIRGINIA L. GIUFFRE
Applicant,
6 and
7 ROSS GOW,
8 Respondent.
9 AND:
10 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
11
12 Virginia L. Giuffre,)
Plaintiff,)
13)
v.) Case No. 15 cv 07433 RWS
14)
Ghislaine Maxwell,)
15 Defendant.)
16
17 Friday, November 18, 2016
18 AT: 8:27 a.m.
19 Taken at:
20
21 Essex Chambers 29,
81 Chancery Lane,
22 London, UK, WC2A 1DD
23
24 Court Reporter: Lisa Barrett, Accredited Real time
Reporter
25

1 A. No, I have not. 08:31:58
2 Q. When you met her last night, did she assist you 08:32:01
3 in preparation for this deposition? 08:32:04
4 A. No. 08:32:07
5 Q. Did she tell you anything about this case? 08:32:10
6 A. No. 08:32:13
7 Q. Do you know Ghislaine Maxwell? 08:32:20
8 A. I do know Ms. Maxwell, yes. 08:32:24
9 Q. How did you meet her? 08:32:26
10 A. I met her in the offices of Devonshires law 08:32:27
11 firm on or around March 2011. 08:32:31
12 Q. So your first meeting was in person? 08:32:37
13 A. First meeting was in person, yes. 08:32:41
14 Q. Had you spoken to her prior to that? 08:32:42
15 A. I believe that the very first engagement was -- 08:32:45
16 I was introduced to her by my chairman Brian Basham but 08:32:50
17 I believe the first words we had were in the Devonshire 08:32:54
18 law office. 08:32:58
19 Q. Did Ms. Maxwell retain the services of you or 08:33:00
20 your firm? 08:33:03
21 A. Yes, she did. 08:33:04
22 Q. And was that in March of 2011? 08:33:06
23 A. It was. 08:33:09
24 Q. Do you have a written agreement? 08:33:11
25 A. We did have a written agreement but I can no 08:33:14

1 longer locate that agreement. 08:33:16
2 Q. Was that agreement ever renewed? 08:33:19
3 A. It was renewed, I believe on or around the 08:33:21
4 beginning of January 2015, potentially the 2nd of January 08:33:26
5 via email. 08:33:32
6 Q. Was the agreement revised when it was renewed? 08:33:34
7 A. It wasn't revised. It was a straightforward 08:33:38
8 re-establishment of the original agreement. 08:33:42
9 Q. Is it your belief that that agreement was in 08:33:45
10 effect on January 2nd, 2015? 08:33:49
11 A. Yes. 08:33:53
12 Q. Do you recall the terms of that agreement? 08:33:59
13 A. Well, it was a re-establishment of an existing 08:34:03
14 agreement so if we go back to the original agreement, it 08:34:06
15 was to provide public relations services to Ms. Maxwell 08:34:08
16 in the matter of Guiffre and her activities. 08:34:13
17 MS. SCHULTZ: I'm marking as Exhibit 2, a 08:34:29
18 document labeled GM 00068. 08:34:31
19 (Exhibit 2 was marked for identification) 08:30:48
20 MR. DYER: Why don't you start making a pile of 08:34:38
21 them, Mr. Gow, because it may be that later on you'll be 08:34:40
22 asked to go back to them. 08:34:43
23 THE WITNESS: Yes, sir. 08:34:44
24 MR. DYER: You don't have copies for me of 08:34:55
25 these documents? 08:34:57

1 MS. SCHULTZ: I do not have any more copies on 08:34:58
2 that. 08:34:59
3 MR. DYER: No, no, no, it's much more important 08:35:00
4 that ... just for the purpose of following things, it's 08:35:00
5 easier. 08:35:03
6 BY MS. SCHULTZ: 08:35:12
7 Q. Is ross@acuityreputation.com your email 08:35:12
8 address? 08:35:15
9 A. It is, my business email, yes. 08:35:16
10 Q. Did you send the email depicted in this 08:35:18
11 document? 08:35:21
12 A. Yes, I did. 08:35:26
13 Q. Did you send it on January 2nd, 2015? 08:35:27
14 A. I believe I did. 08:35:31
15 Q. When you sent that email were you acting 08:35:34
16 pursuant to Ms. Maxwell's retention of your services? 08:35:36
17 A. Yes, I was. 08:35:41
18 Q. Could you please tell me everything you know 08:35:58
19 about Virginia Roberts Guiffre. 08:36:00
20 MS. MENNINGER: Objection, foundation and form. 08:36:09
21 MR. DYER: You may answer. 08:36:11
22 BY MS. SCHULTZ: 08:36:11
23 Q. You testified earlier that you were retained -- 08:36:12
24 MR. DYER: Are you withdrawing that question? 08:36:15
25 BY MS. SCHULTZ: 08:36:17

1 Q. No, I'm not, I'm not. Please -- I am 08:36:17
2 withdrawing that question. 08:36:20
3 MR. DYER: Alright. 08:36:20
4 MS. SCHULTZ: I am withdrawing that question. 08:36:20
5 BY MS. SCHULTZ: 08:36:22
6 Q. You testified previously that you were retained 08:36:22
7 to handle matters relating to Virginia Roberts Guiffre; 08:36:24
8 is that correct? 08:36:29
9 A. Correct. 08:36:30
10 Q. Okay. So you are aware of who Ms. Roberts 08:36:31
11 Guiffre is? 08:36:35
12 A. I am. 08:36:36
13 Q. Okay. Please tell me everything you know about 08:36:37
14 Virginia Roberts Guiffre, please. 08:36:39
15 MS. MENNINGER: Objection, foundation, form, 08:36:42
16 and may call for privileged materials. 08:36:43
17 BY MS. SCHULTZ: 08:36:45
18 Q. You can answer -- to the extent that anything 08:36:46
19 you testify to is not protected by a privilege. 08:36:48
20 A. Ms. Roberts first came to my attention on or 08:36:58
21 around March 2011 when I was called into a meeting with 08:37:03
22 Philip Barden and Ms. Maxwell at Devonshires law office, 08:37:08
23 that she had made -- Ms. Guiffre had made extremely 08:37:14
24 unpleasant allegations about Ms. Maxwell's private life. 08:37:20
25 We were -- Acuity Reputation, my firm 08:37:26

1 was called in to protect Ms. Maxwell's reputation, and 08:37:29
2 to set the record straight. That was -- and that work 08:37:33
3 commenced on or around March of 2011. 08:37:42
4 Q. What do you mean by "set the record straight"? 08:37:46
5 A. Ms. Guiffre's allegations about Ms. Maxwell 08:37:51
6 were, we believe, and to this day continue to believe, 08:37:55
7 untrue, defamatory, and fantastical. And with 08:37:58
8 Devonshires' lawyers, we set about putting out -- 08:38:09
9 crafting a statement which would put Ms. Maxwell's point 08:38:15
10 of view across that Ms. Guiffre's allegations were untrue 08:38:19
11 and, frankly, abhorrent. 08:38:25
12 Q. What advice did you give Miss Maxwell as part 08:38:28
13 of your retention? 08:38:31
14 A. It is standard procedure in cases where it's 08:38:32
15 understood that a party may be defaming one's client that 08:38:36
16 one puts out a statement correcting those allegations and 08:38:42
17 providing a clearer picture of where the truth lies. So 08:38:46
18 it was very much our counsel that Ms. Maxwell put out a 08:38:49
19 statement, vehemently denying the allegations. 08:38:55
20 Q. When you testified that Ms. Guiffre, I'm going 08:38:59
21 to refer to her by just her married name, came to your 08:39:03
22 attention at that March 2011 meeting at Devonshires with 08:39:06
23 Mr. Barden and Ms. Maxwell, correct, and you learned 08:39:12
24 about her at that meeting; is that correct? 08:39:16
25 A. Correct. 08:39:18

1 remaining, so... 08:58:14
2 I've marked as Exhibit 3 RG(UK) 00002. Do you 08:58:15
3 recognize this email? 08:58:47
4 A. I do. 08:58:48
5 Q. Did you receive this email? 08:58:49
6 A. I did, on the -- on New Year's Day 2015. 08:58:50
7 Q. Did you contact Ms. Maxwell after receiving 08:58:57
8 this email? 08:58:58
9 A. I did. 08:58:59
10 Q. Did you make any response to Mr. Ball in any 08:59:19
11 form? 08:59:22
12 A. I did. 08:59:22
13 Q. Can you tell me what you -- what response you 08:59:25
14 made? 08:59:26
15 A. Well, the response to Mr. Ball was part of a 08:59:27
16 series of responses having spoken to my client within 24 08:59:33
17 hours or so, we got back to Mr. Ball with an agreed 08:59:41
18 statement which went out to a number of media. 08:59:44
19 Q. When you say "agreed statement" can you tell me 08:59:50
20 more about what you mean? Who agreed to the statement? 08:59:52
21 A. I need to give you some context, if I may, 08:59:58
22 about that statement. 09:00:01
23 So, this is on New Year's Day. I was 09:00:02
24 in France so the email time here of 21:46, in French 09:00:04
25 time was 22:46, and I was getting up early the next 09:00:10

1 morning to drive my family back from the south of 09:00:14
2 France to England, which is a 14-hour journey, door to 09:00:17
3 door. So on the morning of the 2nd of January, 09:00:22
4 bearing in mind that Ms. Maxwell, I think was in New 09:00:26
5 York then, she was five hours behind, so there was 09:00:28
6 quite a lot of, sort of time difference between the 09:00:30
7 various countries here, I sent her an email, I 09:00:35
8 believe, saying -- parsing this -- forwarding this 09:00:38
9 email to her saying "How do you wish to proceed?" And 09:00:41
10 then I was on the telephone -- I had two telephones in 09:00:45
11 the car, I received in excess of 30 phone calls from 09:00:50
12 various media outlets on the 2nd of January, all 09:00:54
13 asking for information about how Ms. Maxwell was 09:01:00
14 looking to respond to the latest court filings, which 09:01:04
15 were filed on the 30th of December as I understand. 09:01:10
16 And by close -- towards close of play 09:01:13
17 on the 2nd, I received an email forwarded by 09:01:16
18 Ms. Maxwell, containing a draft statement which my 09:01:33
19 understanding was the majority of which had been 09:01:36
20 drafted by Mr. Barden with a header along the lines of 09:01:39
21 "This is the agreed statement." At close of play on 09:01:44
22 the 2nd. 09:01:48
23 So I -- I was -- I had gone under the 09:01:50
24 Channel Tunnel and I was sitting on the other side and 09:01:54
25 that email, which my understanding was that it had 09:01:57

1 been signed off by the client, effectively, was then 09:02:01
2 sent out to a number of media, including Mr. Ball and 09:02:05
3 various other UK newspapers. 09:02:09
4 Q. Mr. Gow, when you say "end of play" and "close 09:02:12
5 of play," are you referring to sending the email that's 09:02:15
6 Exhibit 2? 09:02:18
7 A. Yes, I am. 09:02:24
8 MR. DYER: My understanding is that it went to 09:02:29
9 people other than those listed? 09:02:30
10 THE WITNESS: Yes, that is -- 09:02:32
11 MR. DYER: Just a sample. 09:02:34
12 THE WITNESS: That is a sample. Everyone who 09:02:35
13 effectively -- well, the detail on this, I was driving, 09:02:37
14 so my eldest son in the back had my BlackBerry and was 09:02:40
15 trying to capture -- it was a pretty chaotic day. 09:02:43
16 Most people in the UK were on holiday. In fact, 09:02:48
17 it was a holiday weekend, our office was closed, my PA was 09:02:50
18 on holiday, so my son was basically doing an internship in 09:02:54
19 the back of the car, downloading the names of the callers 09:02:58
20 from various media outlets and -- so we had a list of 09:03:02
21 those so when I got to the car park, at the end of the 09:03:05
22 Eurotunnel thing in the UK, I had numerous names, so the 09:03:09
23 email went out to a wide range of people. 09:03:14
24 But the 30 or so calls I had is an aggregate 09:03:17
25 number, so there might have been five calls from the BBC 09:03:20

1 10 more seconds. 09:19:50
2 MS. SCHULTZ: Understood, and I apologize. 09:19:52
3 MR. SPEARMAN: This is what, Exhibit 9? 09:19:54
4 MR. DYER: Yes. 09:19:56
5 MS. SCHULTZ: Yes. 09:19:56
6 (Exhibit 9 was marked for identification.) 09:19:56
7 BY MS. SCHULTZ: 09:20:01
8 Q. This also appears to be an email chain with you 09:20:02
9 and Ms. Maxwell; is that correct? 09:20:05
10 A. It does appear to be so. 09:20:07
11 Q. Did you send the top email of the chain that 09:20:08
12 says "Okay, G, going with this"? 09:20:10
13 A. I did. 09:20:13
14 Q. And did you receive from Ms. Maxwell, the 09:20:14
15 bottom email of that chain? 09:20:16
16 A. I believe so. Well, I believe -- yes, yeah, it 09:20:17
17 was forwarded from Ms. Maxwell, yes. 09:20:21
18 MR. DYER: Sorry, I don't quite understand that 09:20:29
19 answer. 09:20:31
20 THE WITNESS: I misspoke that. I did receive 09:20:33
21 it from Ms. Maxwell. 09:20:34
22 MR. DYER: Okay. 09:20:38
23 BY MS. SCHULTZ: 09:20:38
24 Q. The subject line does have "FW" which to me 09:20:39
25 indicates it's a forward. Do you know where the rest of 09:20:42

1 this email chain is? 09:20:45
2 A. My understanding of this is: It was a holiday 09:20:49
3 in the UK, but Mr. Barden was not necessarily accessible, 09:20:54
4 at some point in time, so this had been sent to him 09:20:59
5 originally by Ms. Maxwell, and because he was 09:21:03
6 unavailable, she forwarded it to me for immediate action. 09:21:07
7 I therefore respond, "Okay, Ghislaine, I'll go with 09:21:14
8 this." 09:21:19
9 It is my understanding that this is 09:21:20
10 the agreed statement because the subject of the second 09:21:22
11 one is "Urgent, this is the statement" so I take that 09:21:24
12 as an instruction to send it out, as a positive 09:21:27
13 command: "This is the statement." 09:21:30
14 Q. Okay. 09:21:33
15 A. And I say, "Thanks, Philip" because I'm aware 09:21:33
16 of the fact that he had a hand, a considerable hand in 09:21:37
17 the drafting. 09:21:40
18 Q. Okay. Could I ask you to please refer back to 09:21:41
19 Exhibit 2. Looking also at Exhibit 9, Exhibit 9 appears 09:21:47
20 to have five sentences in it. Do you agree that those 09:22:03
21 same five sentences are part of the communication that is 09:22:10
22 borne in Exhibit 2? 09:22:13
23 A. Sorry, could you say that again. I'm just 09:22:18
24 following what your -- 09:22:20
25 Q. It was a bad question. Let me try that again. 09:22:21

1 Q. Okay. Have you ever communicated anything 09:54:42
2 regarding Ms. Guiffre's criminal allegations to the press 09:54:52
3 or the media? 09:54:56
4 A. As part of a wider conversation about her 09:54:58
5 unsavory allegations about Ms. Maxwell, it's possible 09:55:04
6 that I might have done, but I can't recall the detail, 09:55:08
7 I'm afraid. 09:55:11
8 Q. Do you -- do you remember discussing that with 09:55:12
9 The Guardian? 09:55:20
10 A. No, I don't. I'm not saying I didn't but I 09:55:26
11 can't recall. You have to bear in mind, if you'd be so 09:55:29
12 kind, that I've been speaking to over 30 journalists and 09:55:34
13 media outlets about this, and I can't recall every single 09:55:39
14 -- the detail of every single conversation. 09:55:41
15 Q. Earlier you testified with regard to Exhibit 2 09:55:44
16 that in the days following sending that email, you also 09:55:47
17 communicated with other press and media outlets. Do you 09:55:53
18 recall today any of the other press and media outlets you 09:55:58
19 communicated with, in addition to those listed at the top 09:56:02
20 of that email? 09:56:07
21 A. The Guardian, The Sun, from the top of my 09:56:07
22 memory, but in addition to -- in addition to emails there 09:56:14
23 would have been telephone calls and I'm -- there may not 09:56:21
24 be a transcript of those calls, these are emails inter 09:56:25
25 alia, others, and I can't recall every single email that 09:56:33

1 from John Swain? 09:58:42
2 A. I believe I did. 09:58:44
3 Q. That's all the questions I have about that 09:58:49
4 document. 09:58:51
5 A. Thank you. 09:58:52
6 Q. Regarding communications you made after sending 09:59:05
7 the email in Exhibit 2, I believe, and please correct me 09:59:08
8 if I'm wrong, you testified that you received 30 or more 09:59:14
9 calls that were -- that you would classify as press 09:59:17
10 inquiries regarding Ms. Guiffre; is that correct? 09:59:20
11 A. Yes. 09:59:23
12 Q. Do you recall emailing the statement to other 09:59:24
13 entities beyond what is on the list on Exhibit 2? 09:59:29
14 A. Yes, I think I answered that previously. Yes, 09:59:33
15 I mean there is a far -- I said inter alia, so there is a 09:59:36
16 wider range of people that I would have emailed it to in 09:59:40
17 response to incoming queries -- 09:59:43
18 Q. Do you -- 09:59:46
19 A. But I -- 09:59:46
20 Q. Sorry. 09:59:47
21 A. I can't remember every single one. 09:59:48
22 Q. Do you recall ever reading the statement to the 09:59:50
23 press or the media over the phone? 09:59:52
24 A. It's very possible that I would have done so, 09:59:56
25 yes. 09:59:57

1 MR. DYER: Do you mean Exhibit 2? 09:59:58
2 MS. SCHULTZ: Yes. Exhibit 2. 10:00:00
3 THE WITNESS: To be clear, Exhibit 2 was the 10:00:02
4 base document. 10:00:03
5 MS. SCHULTZ: Uh-hmm. 10:00:05
6 THE WITNESS: In addition to the 2011 March 10:00:05
7 statement. Those were the two working documents that 10:00:10
8 were always referred to, both of which -- well, the first 10:00:15
9 one was in a public domain and was on record on the 10:00:17
10 Devonshires -- on -- with Devonshires name at the top on 10:00:21
11 PR Newswire which is a global delivery service. So that 10:00:24
12 was easily accessible by people. And the second one was 10:00:28
13 the -- further to the 2nd of January 2015. 10:00:31
14 BY MS. SCHULTZ: 10:00:38
15 Q. To the extent you can recall or could estimate, 10:00:37
16 how many other emails do you believe you sent bearing 10:00:40
17 that statement that's in Exhibit 2? 10:00:43
18 A. I really can't remember but certainly more than 10:00:47
19 six and probably less than 30, somewhere in between. 10:00:48
20 Any time there was an incoming query 10:00:52
21 it was either dealt with on the telephone by referring 10:00:54
22 them back to the two statements of March 2011 and 10:00:57
23 January 2015 or someone would email them the 10:01:00
24 statement. So no one was left unanswered, broadly, is 10:01:06
25 the -- is where we were. But I can't remember every 10:01:09

1 single person we reached out to. 10:01:13
2 Q. Okay. So is it your testimony that you reached 10:01:19
3 out to individuals who did not first contact you? 10:01:22
4 A. No. We were in response mode. 10:01:26
5 Q. Okay. 10:01:28
6 A. There was enough to do responding to incoming 10:01:29
7 queries, I wouldn't have been making more work, to be 10:01:33
8 honest. 10:01:38
9 Q. Alright. 10:01:38
10 MR. DYER: So journalists paid no attention to 10:01:42
11 your "No further communication will be provided on the 10:01:44
12 matter." 10:01:47
13 A. No -- that's quite correct, sir, and there 10:01:48
14 probably was a -- it's regarded as tweaking their tales. 10:01:50
15 BY MS. SCHULTZ: 10:02:00
16 Q. Mr. Gow, I'm handing you what I've marked as 10:02:00
17 Exhibit 14. The Bates number is RG(UK) 000004. I'll 10:02:04
18 give you a moment to look at it. 10:02:17
19 (Exhibit 14 was marked for identification.) 10:02:19
20 BY MS. SCHULTZ: 10:02:43
21 Q. Thank you. Toward the top of the page there is 10:02:44
22 a passage that reads: 10:02:47
23 "Apologies, should read 10:02:49
24 Virgina Roberts all the way 10:02:51
25 through." [As read] 10:02:53

1 servicing ultra high net worth clients, individuals, 11:23:14
2 corporates, governments and NGOs, managing their media 11:23:20
3 relations and protecting their reputation. 11:23:25
4 Q. Approximately how long have you been providing 11:23:27
5 such services? 11:23:30
6 A. Acuity was set up in 2010. 11:23:31
7 (Exhibit 26 was marked for identification.) 11:23:42
8 BY MS. SCHULTZ:
9 Q. I'm going to hand you what I've marked as 11:23:37
10 Exhibit 26. 11:23:39
11 A. Thank you. 11:23:43
12 Q. Does this document fairly depict pages from 11:23:53
13 your -- from Acuity Reputation's website? 11:23:55
14 A. It does. 11:23:59
15 Q. Do you see where it says "We manage reputation 11:24:02
16 and forge opinion through public relations, strategic 11:24:06
17 communications and high level networking"? 11:24:10
18 A. I do. 11:24:13
19 Q. Is that a true statement? 11:24:13
20 A. Say it again. Sorry. 11:24:15
21 Q. Is that a true statement? 11:24:17
22 A. It is, yes. I wrote that statement. 11:24:18
23 MR. DYER: Sorry, you read it or you wrote it? 11:24:20
24 THE WITNESS: I wrote it, so I do recognize it. 11:24:22
25 BY MS. SCHULTZ: 11:24:28

1 Q. Is it correct that public relations and 11:24:29
2 strategic communications are things that you personally 11:24:31
3 do as part of your professional activities? 11:24:36
4 A. I personally -- I'm involved in public 11:24:40
5 relations and strategic communications, yes. 11:24:44
6 Q. Is it correct that the media is the intended 11:24:48
7 recipient of this strategic communications. 11:24:51
8 A. It's -- the -- it's a larger ground than just 11:24:55
9 the media. There may be lobbyists, government think 11:24:59
10 tanks, focus groups, government departments. 11:25:05
11 Q. Would it be fair to say that the media is often 11:25:09
12 the intended recipient of strategic communications? 11:25:12
13 A. It is a frequent recipient. 11:25:16
14 Q. Referent recipient? 11:25:18
15 A. But not the sole recipient. 11:25:21
16 Q. Okay. Do you see where your website claims 11:25:23
17 that your company has "excellent relationships with the 11:25:25
18 media"? 11:25:28
19 A. I do. 11:25:30
20 Q. Is that a true statement? 11:25:31
21 A. That is true, yeah. 11:25:33
22 MR. DYER: Except Mr. Syson. 11:25:37
23 THE WITNESS: Except Mr. Syson, sir. 11:25:38
24 MS. SCHULTZ: Of course. 11:25:40
25 THE WITNESS: And representatives of the Daily 11:25:40

1 Mirror. 11:25:41
2 BY MS. SCHULTZ: 11:25:42
3 Q. Is it correct that you advertise your 11:25:42
4 "excellent relationships with the media" because your 11:25:46
5 services often include giving communications to the media 11:25:49
6 on behalf of your clients? 11:25:52
7 A. Yes. 11:25:55
8 MS. SCHULTZ: That's all I have for right now. 11:25:59
9 MR. DYER: I just wanted to ask you one 11:26:01
10 question about Exhibit 25. This was the email from the 11:26:03
11 New York Daily News to you which you sent on to 11:26:13
12 Ms. Maxwell and Mr. Barden. 11:26:17
13 THE WITNESS: Yes. 11:26:20
14 MR. DYER: Do you recollect whether you were 11:26:29
15 asked to make any statement in response to this matter, 11:26:30
16 the issue of proceedings in September of last year? 11:26:35
17 THE WITNESS: I don't, sir. It's always been 11:26:40
18 the case that Mr. Barden and I were encouraging 11:26:45
19 Ms. Maxwell to make a statement, but she was very 11:26:50
20 reluctant to do so. 11:26:57
21 MR. DYER: Right. I think you've got him to 11:27:00
22 accept that up until some time March, April, May, he may 11:27:02
23 have spoken to Mr. Syson. And that was the last 11:27:06
24 statement that there's any evidence of him making about 11:27:10
25 this matter. But on the evidence, as I understand it, 11:27:14

1 CERTIFICATE OF COURT REPORTER
2
3 I, Lisa M. Barrett, an Accredited Real-time Reporter,
4 hereby certify that the testimony of the witness Ross
5 Neil Sutherland Gow in the foregoing transcript,
6 numbered pages 1 through 122, taken on this 18th day
7 of November, 2016 was recorded by me in machine
8 shorthand and was thereafter transcribed by me; and
9 that the foregoing transcript is a true and accurate
10 verbatim record of the said testimony.
11
12
13 I further certify that I am not a relative, employee,
14 counsel or financially involved with any of the
15 parties to the within cause, nor am I an employee or
16 relative of any counsel for the parties, nor am I, in
17 any way, interested in the outcome of the within
18 cause.
19
20
21 Signed: ....
22 Name: Lisa M. Barrett, RPR, CRR, CRC, CSR
23 Date: ....
24
25

EXHIBIT 7

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

--x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

June 20, 2016
9:12 a.m.

C O N F I D E N T I A L

Deposition of [redacted] pursuant to notice, taken by Plaintiff, at the offices of Podhurst Orseck, 25 West Flagler Street, Suite 800, Miami, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 [REDACTED] - CONFIDENTIAL
2 BY MR. EDWARDS:
3 Q. When you got to his house, you were
4 requested to give a massage?
5 MR. PAGLIUCA: Object to foundation and
6 form.
7 THE WITNESS: I don't exactly remember. I
8 don't remember if I was asked in the kitchen.
9 I don't remember if -- I don't remember.
10 BY MR. EDWARDS:
11 Q. Massage was part of the game, though?
12 MR. PAGLIUCA: Object to form and
13 foundation.
14 THE WITNESS: I don't remember. I'm
15 sorry.
16 BY MR. EDWARDS:
17 Q. But even during this deposition today, we
18 have described at times you giving him a massage?
19 A. Yes. You're asking about my first
20 encounter, though.
21 Q. Sorry, I'm just trying to sum up the whole
22 thing.
23 A. Okay.
24 Q. Was massage part of the lure to get you
25 specifically to his house?

1 [REDACTED] - CONFIDENTIAL
2 A. Yes.
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 BY MR. EDWARDS:
6 Q. And at the time, you are 15, 16 or 17
7 years old?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: Yes.
11 BY MR. EDWARDS:
12 Q. No massage experience?
13 A. No.
14 Q. You were told to bring other girls to his
15 house?
16 MR. PAGLIUCA: Object to form and
17 foundation.
18 THE WITNESS: After a while, yes.
19 BY MR. EDWARDS:
20 Q. These massages were turned sexual by
21 Jeffrey, as opposed to by anyone else?
22 A. Jeffrey took my clothes off without my
23 consent the first time I met him.
24 Q. The massages were scheduled by people
25 working for Jeffrey?

1 [REDACTED] - CONFIDENTIAL
2 A. I don't recall.
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 BY MR. EDWARDS:
6 Q. Jeffrey Epstein, during these massages,
7 would use sex toys or have sex toys used?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: Well, at that point, it's no
11 longer a massage. Something else is going on.
12 But, yes, he would take out adult toys and
13 different things.
14 BY MR. EDWARDS:
15 Q. While you were a teenager, Jeffrey Epstein
16 asked you to live with him?
17 A. Yes. He wanted me to be emancipated.
18 Q. Jeffrey Epstein encouraged girl-on-girl
19 sex?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Yes.
23 BY MR. EDWARDS:
24 Q. And after you cooperated with the police,
25 you were intimidated by people working for Jeffrey

1 [REDACTED] - CONFIDENTIAL
2 Epstein?
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 THE WITNESS: Yes.
6 MR. EDWARDS: All right. I don't have
7 anything further for you. I apologize that we
8 even had to go through this, all right?
9 THE WITNESS: Okay.
10 E X A M I N A T I O N
11 BY MR. PAGLIUCA:
12 Q. Ms. [REDACTED], by name is Jeff Pagluica. I
13 live in Denver, Colorado. And, like you, I don't
14 want to be here today either, okay? I would rather
15 be in Denver.
16 I just want to -- as I understand it, and
17 I'm not trying to get into any of your treatment
18 over the last, let's say, 10 years, because I don't
19 know how long it's been, but as I understand what
20 you and your lawyer have said here today, you have
21 been involved in some number of years of therapy, in
22 which the purpose -- part of the purpose of the
23 therapy has been to forget all of these events that
24 Mr. Edwards was asking you questions about; is that
25 correct?

1 [REDACTED] - CONFIDENTIAL
2 CERTIFICATE OF OATH
3 STATE OF FLORIDA)
4 COUNTY OF MIAMI-DADE)
5
I, the undersigned authority, certify that
6 [REDACTED] personally appeared before me and
was duly sworn.
7 WITNESS my hand and official seal this
23rd day of June, 2016.
8
9
Kelli Ann Willis, RPR, CRR
10 Notary Public, State of Florida
Commission FF928291, Expires 2-16-20
11 + + + + + + + + + + + + + + + + + +
12 CERTIFICATE
13 STATE OF FLORIDA)
14 COUNTY OF MIAMI-DADE)
15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of [REDACTED] that a
review of the transcript was not requested; and
18 that the transcript is a true record of my
stenographic notes.
19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.
22 Dated this 23rd day of June, 2016.
23
24 KELLI ANN WILLIS, RPR, CRR
25

EXHIBIT 8

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE,
Plaintiff,
v. CASE NO.:15-CV-07433-RWS

GHISLAINE MAXWELL,

Defendants.

January 25, 2017
9:05 a.m. - 12:44 p.m.
401 E. Las Olas Boulevard
Fort Lauderdale, Florida

**** C O N F I D E N T I A L ****

VIDEOTAPE DEPOSITION OF SARAH KELLEN

Taken on behalf of the before Michael J. D'Amato, RMR, Notary Public in and for the State of Florida at Large, pursuant to Notice of Taking Deposition in the above cause.

Job # 293966

1 decline to answer.
2 Q. Who introduced you to Ghislaine Maxwell?
3 A. On advice of my counsel I must invoke my Fifth
4 and Sixth Amendment privilege which I understand
5 protect the innocent and therefore I must unfortunately
6 decline to answer.
7 Q. When you met Ghislaine Maxwell was she working
8 for Jeffrey Epstein?
9 A. On advice of my counsel I must invoke my Fifth
10 and Sixth Amendment privilege which I understand
11 protect the innocent and therefore I must unfortunately
12 decline to answer.
13 Q. Did Ghislaine Maxwell work as a recruiter for
14 young girls for Jeffrey Epstein when you met her?
15 A. On advice of my counsel I must invoke my Fifth
16 and Sixth Amendment privilege which I understand
17 protect the innocent and therefore I must unfortunately
18 decline to answer.
19 Q. I'm defining young girls to mean females the
20 ages 12 to 23. Do you understand that?
21 A. On advice of my counsel I must invoke my Fifth
22 and Sixth Amendment privilege which I understand
23 protect the innocent and therefore I must unfortunately
24 decline to answer.
25 Q. Didn't Ghislaine Maxwell approach you to

1 girls for sex with Jeffrey Epstein?
2 A. On advice of my counsel I must invoke my Fifth
3 and Sixth Amendment privilege which I understand
4 protect the innocent and therefore I must unfortunately
5 decline to answer.
6 Q. Did you assist Ghislaine Maxwell in procuring
7 underage girls for sex with Jeffrey Epstein?
8 A. On advice of my counsel I must invoke my Fifth
9 and Sixth Amendment privilege which I understand
10 protect the innocent and therefore I must unfortunately
11 decline to answer.
12 Q. Isn't it true that Ghislaine Maxwell would
13 recruit underage girls for sex and sex acts with
14 Jeffrey Epstein?
15 A. On advice of my counsel I must invoke my Fifth
16 and Sixth Amendment privilege which I understand
17 protect the innocent and therefore I must unfortunately
18 decline to answer.
19 Q. Did Ghislaine Maxwell give you information on
20 what underage girls she had contact information for?
21 A. On advice of my counsel I must invoke my Fifth
22 and Sixth Amendment privilege which I understand
23 protect the innocent and therefore I must unfortunately
24 decline to answer.
25 Q. Did Ghislaine Maxwell teach you to offer these

1 CERTIFICATE OF COURT REPORTER
2 I, MICHAEL J. D'AMATO, a Registered Merit Reporter
3 and Notary Public in and for the State of Florida at
4 Large, do HEREBY CERTIFY that I was authorized to and
5 did stenographically report the deposition of SARAH
6 KELLEN; that a review of the transcript was requested;
7 and that the foregoing transcript, pages from 1 to 197,
8 is a true and accurate record of my stenographic notes.
9 I FURTHER CERTIFY that I am not a relative,
10 employee, attorney, or counsel of any of the parties, nor
11 am I a relative or employee of any of the parties'
12 attorney or counsel connected with the action, nor am I
13 financially interested in the action.
14 Dated this 27th day of January 2017.
15 ________________________
16 MICHAEL J. D'AMATO,
17 Registered Merit Reporter
18
19
20
21
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25

EXHIBIT 9

(Filed Under Seal)

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

VIDEOTAPE DEPOSITION OF: PETER KENT
November 29, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

PURSUANT TO SUBPOENA AND NOTICE, the videotape deposition of PETER KENT was taken on behalf of the Plaintiff at 150 East 10th Avenue, Denver, Colorado 80230, on November 29, 2016, at 9:00 a.m., before Sandra L. Bray, Registered Diplomate Reporter, Certified Realtime Reporter, and Notary Public within Colorado.

1 MS. McCAWLEY: I'm just asking about his
2 retention, which I believe is discoverable under
3 Rule 26.
4 Q. (BY MS. McCAWLEY) Do you recall whether
5 you were retained to perform work for one expert or
6 two experts?
7 THE DEPONENT: Am I allowed to answer
8 this?
9 MR. PAGLIUCA: Yes.
10 A. I actually don't recall.
11 Q. (BY MS. McCAWLEY) Do you know whether
12 you were provided with one report or two reports when
13 you initially were retained?
14 A. I believe I was provided with both the
15 reports at the same time.
16 Q. Let me turn to about halfway back. So
17 it's going to be -- there's markings on the bottom.
18 It says PK-005.
19 A. Yes.
20 Q. And it indicates an amount there, an
21 invoice. Is this one of your invoices?
22 A. Yes.
23 Q. It indicates an amount of $17,875?
24 A. Yes.
25 Q. Is that the total amount you've been

1 paid, with the exception of what we paid you for your
2 testimony here today, in this matter?
3 A. I think so. What date was this?
4 Q. It looks like it's dated October 29th,
5 2016.
6 A. Oh, yes. In that case, yes.
7 Q. Have you performed any work after that
8 date that you've been paid for?
9 A. Only in preparation for this deposition.
10 Q. Have you been paid for that work?
11 A. No.
12 Q. No. Have you invoiced that work yet?
13 A. No.
14 Q. All right. And then I'm going to turn
15 you to the next page -- please don't put it away
16 yet -- which appear to be invoices.
17 A. Time sheets.
18 Q. Time sheets? You tell me.
19 A. It's a time sheet.
20 Q. Is this typically how you record your
21 time when you're doing expert work?
22 A. Yes.
23 Q. And this indicates -- the first entry is
24 on 9/28/2016. Is that when you commenced work on this
25 matter?

REPORTER'S CERTIFICATE

STATE OF COLORADO)
) ss.
CITY AND COUNTY OF DENVER)

I, SANDRA L. BRAY, Registered Diplomate Reporter, Certified Realtime Reporter, and Notary Public ID 20084001729, State of Colorado, do hereby certify that previous to the commencement of the examination, the said PETER KENT was duly sworn by me to testify to the truth in relations to the matters in controversy between the parties hereto; that the said deposition was taken in machine shorthand by me at the time and place aforesaid and was thereafter reduced to typewritten form; that the foregoing is a true transcript of the questions asked, testimony given, and proceedings had.

I further certify that I am not employed by, related to, nor of counsel for any of the parties herein nor otherwise interested in the outcome of this litigation.

IN WITNESS WHEREOF, I have affixed my signature this 8th of December, 2016.

My commission expires January 16, 2020.

__X__ Reading and Signing was requested.

_____ Reading and Signing was waived.

_____ Reading and Signing is not required.

EXHIBIT 10

(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- x
VIRGINIA L. GIUFFRE,
Plaintiff,
Case No.: 15-cv-07433-RWS
-against-
GHISLAINE MAXWELL,
Defendant.
- x

C O N F I D E N T I A L

Videotaped oral deposition of NADIA MARCINKO, taken pursuant to notice, was held at the law offices of BOIES SCHILLER & FLEXNER, LLP, 575 Lexington Avenue, New York, New York commencing January 17, 2017, 1:04 p.m., before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

1 N. Marcinko - Confidential
2 reside, a dwelling that is paid for by either
3 Jeffrey Epstein or Ghislaine Maxwell?
4 A. Same answer.
5 Q. Do you know Jeffrey Epstein?
6 A. Same answer.
7 Q. Do you know Ghislaine Maxwell?
8 A. Same answer.
9 Q. How old were you when you met
10 either Jeffrey Epstein or Ghislaine Maxwell?
11 A. Same answer.
12 Q. Who introduced to you Ghislaine
13 Maxwell?
14 A. Same answer.
15 Q. When you met Ghislaine Maxwell, was
16 she working for Jeffrey Epstein?
17 A. Same answer.
18 Q. Did Ghislaine Maxwell work as a
19 recruiter of young girls for Jeffrey Epstein
20 when you met her?
21 A. Same answer.
22 Q. Did Ghislaine Maxwell instruct you
23 to recruit young girls for Jeffrey Epstein?
24 A. Same answer.
25 Q. Did Ghislaine Maxwell encourage

1 N. Marcinko - Confidential
2 Ghislaine Maxwell?
3 A. Same answer.
4 Q. Have you observed Ghislaine Maxwell
5 and Jeffrey Epstein offering these young
6 girls money, education or other things of
7 value during the massage to get that young
8 girl to return to Jeffrey Epstein for sexual
9 purposes?
10 A. Same answer.
11 Q. Have you observed Ghislaine Maxwell
12 and Jeffrey Epstein convert what started as a
13 massage with these young girls into something
14 sexual?
15 A. Same answer.
16 Q. Have you understood when I talk
17 about young girls, I'm talking about girls
18 between the age range of 13 and 23 years old?
19 A. Same answer.
20 Q. Have you observed that when
21 Ghislaine Maxwell and Jeffrey Epstein used
22 the term, massage, it always includes sex?
23 A. Same answer.
24 Q. Was massage a word used by
25 Ghislaine Maxwell to lure girls into sex with

1
2 CERTIFICATE
3
I HEREBY CERTIFY that the witness,
4 NADIA MARCINKO, was duly sworn by me and that
the deposition is a true record of the
5 testimony given by the witness.
6 ______________________________
Leslie Fagin,
7 Registered Professional Reporter
Dated: January 17, 2017
8
9
10
(The foregoing certification of
11 this transcript does not apply to any
12 reproduction of the same by any means, unless
13 under the direct control and/or supervision
14 of the certifying reporter.)
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25

EXHIBIT 11
(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- x
VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:
-against- 15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendants.

- x

CONFIDENTIAL

Videotaped deposition of GHISLAINE MAXWELL, taken pursuant to subpoena, was held at the law offices of BOIES SCHILLER & FLEXNER, 575 Lexington Avenue, New York, New York, commencing April 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026

1 G Maxwell - Confidential
2 Q. I'm not talking about friends. I'm
3 talking about individuals --
4 MR. PAGLIUCA: I'm going to object
5 to you interrupting the witness who was
6 answering your question. The question
7 was, have you ever seen anyone, female
8 under the age of 18 at the house and
9 that's the question she was answering.
10 If you want to strike that question and
11 ask another question, feel free, but let
12 the witness respond, please.
13 MS. McCAWLEY: I will do that.
14 Q. Have you ever observed a female
15 under the age of 18 at Jeffrey Epstein's home
16 that was not a friend, a child -- one of your
17 friend's children?
18 A. Again, I can't testify to that
19 because I have no idea what you are talking
20 about.
21 Q. You have no idea what I'm talking
22 about in the sense you never observed a
23 female under the age of 18 at Jeffrey
24 Epstein's home that was not one of your
25 friend's children, is that correct?

1 G Maxwell - Confidential
2 MR. PAGLIUCA: Object to the form
3 and foundation.
4 A. How would I possibly know how
5 someone is when they are at his house. You
6 are asking me to do that. I cannot possibly
7 testify to that. As far as I'm concerned,
8 everyone who came to his house was an adult
9 professional person.
10 Q. Are you familiar with the police
11 report that was issued in respect to the
12 investigation in this matter?
13 MR. PAGLIUCA: Object to the form
14 and foundation.
15 Q. Are you familiar with the police
16 report that was used in this matter, the
17 investigation of Jeffrey Epstein, has been
18 produced as a document in this matter?
19 A. I have seen a police report.
20 (Maxwell Exhibit 1, police report,
21 marked for identification.)
22 Q. The police report that you have in
23 front of you, can you turn to page 28 of that
24 report, the numbers are on the top right-hand
25 corner.

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2 -- just another one of Virginia's many
3 fictitious lies and stories to make this a
4 salacious event to get interest and press.
5 It's absolute rubbish.
6 Q. Were you in charge of hiring
7 individuals to provide massages for Jeffrey
8 Epstein?
9 A. My job included hiring many people.
10 There were six homes. As I sit here, I hired
11 assistants, I hired architects, I hired
12 decorators, I hired cooks, I hired cleaners,
13 I hired gardeners, I hired pool people, I
14 hired pilots, I hired all sorts of people.
15 In the course and a very small part
16 of my job was from from time to time to find
17 adult professional massage therapists for
18 Jeffrey.
19 Q. When you say adult professional
20 massage therapists, where did you find these
21 massage therapists?
22 A. From time to time I would visit
23 professional spas, I would receive a massage
24 and if the massage was good I would ask that
25 man or woman if they did home visits.

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2 Q. Did you hire her?
3 A. First of all, I don't hire girls
4 like that, so let's be clear, I already
5 testified to that, and I have no idea what
6 you are referring to.
7 Q. When you say girls like that, what
8 do you mean?
9 A. I hire people who are professional
10 at the house. You are asking if I hired
11 somebody to do what, I don't know what you
12 are talking about. I hired people to work in
13 the homes.
14 Q. What was Nadia Marcinkova doing?
15 MR. PAGLIUCA: Object to the form
16 and foundation.
17 A. I have no idea what Nadia
18 Marcinkova was doing. I didn't hire her and
19 I don't know what you are referring to.
20 Q. You met Nadia Marcinkova?
21 A. I testified I did.
22 Q. Did she work for Jeffrey Epstein?
23 A. I have no idea what she did.
24 Q. Have you flown on planes with Nadia
25 Marcinkova?

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2 MR. PAGLIUCA: Objection to the
3 form and foundation.
4 A. I don't know what that means,
5 masseuse obligation, I don't know what you
6 are referring to. Would you like to ask the
7 question properly?
8 Q. I think it was proper. I will ask
9 it again.
10 Did you ever assist in getting
11 Virginia Roberts a cell phone to use during
12 the time that she worked for Jeffrey Epstein?
13 A. I have no recollection of doing
14 anything of that nature.
15 Q. Did you ever tell Virginia that you
16 wanted her to have a cell phone so that she
17 could be on call regularly?
18 A. I have no recollection of that
19 conversation.
20 Q. How often would Virginia come over
21 to the house in Palm Beach to give massages?
22 MR. PAGLIUCA: Objection to the
23 form and foundation.
24 A. Ask the question again, please.
25 Q. How often did Virginia Roberts come

1 G Maxwell - Confidential
2 over to the house in Palm Beach to give
3 massages?
4 A. It's important to understand that I
5 wasn't with Jeffrey all the time. In fact, I
6 was only in the house less than half the
7 time, so I cannot testify to when I wasn't in
8 the house how often she came when I wasn't
9 there.
10 What I can say is that I barely
11 would remember her, if not for all of this
12 rubbish, I probably wouldn't remember her at
13 all, except she did come from time to time
14 but I don't recollect her coming as often as
15 she portrayed herself.
16 Q. How many times a day on an average
17 day would Jeffrey Epstein get a massage?
18 MR. PAGLIUCA: Objection to the
19 form and foundation.
20 A. When I was at the house and when I
21 was there with him, he received a massage, on
22 average, about once a day.
23 Q. Just once?
24 A. Yes.
25 Q. Were there days when he received

1 G Maxwell - Confidential
2 four or five?
3 MR. PAGLIUCA: Objection to the
4 form and foundation.
5 A. When I was present at the house, I
6 never saw something like that.
7 Q. Do you know if Virginia was
8 required to be on call at all times to come
9 to the house if Jeffrey wanted her there?
10 MR. PAGLIUCA: Objection to the
11 form and foundation.
12 A. I have no idea of the arrangements
13 that Virginia made with Jeffrey.
14 Q. When Virginia was in New York,
15 would Virginia sleep at Jeffrey's mansion in
16 New York?
17 MR. PAGLIUCA: Objection to the
18 form and foundation.
19 A. I don't recollect her being in New
20 York and I have no idea where she slept.
21 Q. You don't ever remember seeing
22 Virginia Roberts in New York?
23 MR. PAGLIUCA: Objection to the
24 form and foundation.
25 A. I would barely recollect her at

1 G Maxwell - Confidential
2 him at any of those homes?
3 A. Again, Virginia is absolutely
4 totally lying. This is a subject of
5 defamation about Virginia and the lies she
6 has told and one of lies she told was that
7 President Clinton was on the island where I
8 was present. Absolutely 1000 percent that is
9 a flat out total fabrication and lie.
10 Q. You did fly on planes, Jeffrey
11 Epstein's planes with President Clinton, is
12 that correct?
13 A. I have flown, yes.
14 Q. Would it be fair to say that
15 President Clinton and Jeffrey are friends?
16 A. I wouldn't be able to characterize
17 it like that, no.
18 Q. Are they acquaintances?
19 A. I wouldn't categorize it.
20 Q. He just allowed him to use his
21 plane?
22 A. I couldn't categorize Jeffrey's
23 relationship.
24 Q. When you were on the plane with
25 Jeffrey and President Clinton, did you

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2 building that you would have seen when you
3 were on the trip in Europe?
4 MR. PAGLIUCA: Objection to the
5 form and foundation.
6 A. I can't possibly answer that.
7 Q. Do you recall Virginia ever taking
8 pictures?
9 A. I barely recall Virginia, period.
10 Q. Do you recall her ever taking
11 pictures?
12 A. No, I don't.
13 Q. I'm going to direct your attention,
14 still within the flight logs to -- starting
15 on the next page from where you just were
16 which is going to be 000747. And the date at
17 the top says 2001, you will see March and I'm
18 directing your attention down towards the
19 middle to the bottom where you will see the
20 numbers 27, 29 and 31.
21 A. Uh-huh.
22 Q. And we've got actually I'm going to
23 direct your attention to the one that starts
24 with TEB for Teterboro to SAF for Santa Fe
25 and the one below it Santa Fe to Palm Beach

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2 her but you would have to ask Jeffrey what he
3 brought her on the trip for.
4 Q. But she would travel with him when
5 there was a work trip like this?
6 A. I can't -- I'm seeing that she is
7 on this flight but I have no idea what she is
8 doing, he invited her, it would not be my
9 job.
10 Q. What about Nadia Bjorlin, would she
11 regularly travel with Jeffrey on flights?
12 A. I have no idea, you would have to
13 look through the flight logs. I have no
14 idea.
15 Q. Your recollection is -- what is
16 your recollection, do you recollect Nadia
17 traveling often on flights with Jeffrey?
18 A. Absolutely not. No, not at all. I
19 don't recollect her actually on the flight at
20 all.
21 Q. I think you can set that aside for
22 the moment.
23 (Maxwell Exhibit 9, message pad
24 pages, marked for identification.)
25 Q. We will mark as Exhibit 9 these

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2 excerpts from -- we will identify what they
3 are but from the message pads.
4 Did you want to correct anything?
5 A. I want to make an addendum.
6 Would you mind rereading the last
7 question back to me?
8 (Record read.)
9 A. I also just want to say that at
10 this point I cannot recollect flying to
11 parties. Jeffrey went for work so -- was
12 this in Santa Fe, this flight as well.
13 Q. The flight we were looking at, yes
14 but it was to Santa Fe --
15 A. I don't recall going to any parties
16 in Santa Fe at any time but certainly flying
17 to Santa Fe for a party seems highly
18 improbable.
19 Q. So I'm going to direct your
20 attention to the document that I set before
21 you which is Bates number SAO 01456 and it
22 has different Bates numbers because it's a
23 smaller version of the larger production.
24 These are the pages I will be asking about.
25 In the time that you were working

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2 with Jeffrey in Palm Beach, do you recall a
3 process for taking, anybody at the house
4 taking messages when incoming phone calls
5 came in?
6 A. You are supposed to take a message
7 and receive the message and write the message
8 down. Who was the message was for, what time
9 it was taken and who took it and what the
10 message was, obviously.
11 Q. Does what's in front of you look
12 familiar with respect to the message pads
13 that you would have used at the house?
14 A. It is familiar.
15 Q. I'm going to direct your attention
16 to the second page of it?
17 MR. PAGLIUCA: These all have SAO
18 numbers on them or Bates ranges and I
19 don't see any of your Bates ranges on
20 these. I know you have produced message
21 pads but those have your Bates range
22 numbers on them and I'm wondering if
23 these are different documents.
24 MS. McCAWLEY: It's the same, just
25 ours have the Bates underneath them.

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2 believe. Do you believe --
3 A. I can only testify --
4 Q. Let me finish the question so the
5 record is clear.
6 Do you believe Jeffrey Epstein
7 sexually abused minors?
8 MR. PAGLIUCA: Objection to the
9 form and foundation.
10 Q. You can answer.
11 A. I can only testify to what I know.
12 I know that Virginia is a liar and I know
13 what she testified is a lie. So I can only
14 testify to what I know to be a falsehood and
15 half those falsehoods are enormous and so I
16 can only categorically deny everything she
17 has said and that is the only thing I can
18 talk about because I have no knowledge of
19 anything else.
20 Q. I'm not asking about Virginia. I'm
21 asking whether you believe that Jeffrey
22 Epstein sexually abused minors?
23 A. Again, I repeat, I can only go on
24 what I know and what I know is a falsehood
25 based on what Virginia said.

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2 What I'm asking you is whether you
3 believe Jeffrey Epstein abused minors?
4 MR. PAGLIUCA: I object to the form
5 and you made your record, she answered
6 the question. A fair reading of her
7 answer is she doesn't have a belief
8 because she doesn't have any personal
9 knowledge.
10 MS. McCAWLEY: Now you are
11 testifying for the witness. Let her
12 answer the question.
13 MR. PAGLIUCA: It's a fair answer
14 to the question.
15 A. Again, I testified my only personal
16 knowledge concerns Virginia and everything
17 Virginia has said is an absolute lie, which
18 is why we are here in this room. If you are
19 asking me to testify about things I have no
20 knowledge of other than the police report
21 that you showed me, I am not in a position to
22 make a statement based on that because you
23 are asking me to speculate and I cannot
24 speculate.
25 Q. I'm asking you about your belief.

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2 I'm not asking you to speculate at all. I'm
3 asking what you believe.
4 A. You are asking me to speculate and
5 I won't speculate.
6 Q. I'm not asking you to speculate.
7 I'm asking what you believe.
8 MR. PAGLIUCA: She answered the
9 question and we can move on.
10 MS. McCAWLEY: She hasn't answered
11 the question.
12 MR. PAGLIUCA: We are not going to
13 engage in this debate. She answered the
14 question. If you want to mark it and
15 move to compel an answer to the
16 question, have at it. Okay.
17 Q. Ms. Maxwell, is it your belief that
18 Jeffrey Epstein interacted sexually with
19 minors?
20 A. Again, you are asking me the same
21 type of question exactly but with different
22 language. Again, my only knowledge of
23 somebody who claims these things that I have
24 personal knowledge of is Virginia. Virginia
25 is an absolute liar and everything she has

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2 said is a lie. Therefore, based on those
3 lies I cannot speculate on what anybody else
4 did or didn't do because if Virginia is the
5 example of what that story is and everything
6 she said is false, so everything that leads
7 from that is false.
8 Q. So the 30 other minor children in
9 the police report are also telling lies about
10 being sexually abused during massages with
11 Mr. Epstein?
12 MR. PAGLIUCA: Objection to the
13 form and foundation. Counsel, can you
14 show me in these police reports who the
15 30 minors are?
16 MS. McCAWLEY: I'm asking my
17 question.
18 MR. PAGLIUCA: You are making a
19 representation about numbers, you are
20 making a representation on the record
21 about what people said or didn't say.
22 We have no knowledge about that. These
23 are all redacted records so these are
24 bad questions. They don't lead to any
25 admissible evidence. It is only being

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2 A. I'm carrying on.
3 Q. I'm sorry. I thought you were
4 done.
5 A. Please. Her statement also that
6 she was driven by her father to Palm Beach.
7 She was driven by her mother, as a matter of
8 fact. Her whole entire characterization of
9 the first meeting with Jeffrey, as I was
10 outside speaking to her mother.
11 Q. Let me stop you there, so we don't
12 get too far ahead. Let me make sure I
13 understand your testimony.
14 The first, in the first piece when
15 you were talking, I believe you said and
16 correct me if I'm wrong, that her
17 characterization of the first meeting at
18 Mar-a-Lago was an obvious lie.
19 What part of that meeting was an
20 obvious lie?
21 A. By her own testimony, all her
22 various many different descriptions of what
23 she was or wasn't or where she was or wasn't,
24 they have all changed. She was either front
25 of house or bathroom attendant. I don't know

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2 what she was, so just by her own words, one
3 doesn't know what's true and what isn't true.
4 Q. Are you saying what position she
5 said she was working in, is that what you are
6 considering the obvious lie?
7 A. I said inconsistency within her own
8 statement from everything, so in the
9 beginning it starts off with different
10 statements.
11 Q. Then I believe you said the second
12 piece was that she was driven by her father?
13 A. I said she was driven by her
14 mother.
15 Q. That's the obvious lie?
16 A. It's an obvious lie to me.
17 Q. You said why don't you state it in
18 your own words but the characterization of
19 how she was with Jeffrey, what about that is
20 an obvious lie?
21 A. I was standing outside talking to
22 her mother so the entire story is a
23 fabrication.
24 Q. Did she not have sex with Jeffrey
25 Epstein during that first massage?

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2 up to the room and start a massage?
3 A. He would not.
4 Q. So the young girls in the police
5 report who say they came over and were led up
6 to the room on the first day, would they be
7 wrong about that?
8 MR. PAGLIUCA: Objection to form
9 and foundation.
10 A. I can't comment what happened when
11 I was not at the house. I can only comment
12 when I was at the house.
13 Q. Was there ever a time where a woman
14 came to the house for the first time to give
15 a massage and Jeffrey had the massage that
16 day?
17 MR. PAGLIUCA: Objection to the
18 form and foundation.
19 A. Can we talk about adult
20 professional masseuses, please?
21 Q. I'm asking, whether adult or
22 underage?
23 A. I'm not interested in talking about
24 underage. I can only testify to what I know,
25 professional masseuses, adult, I cannot

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2 testify to anything else.
3 Q. Why can't you testify to an
4 underage girl that came over and was led up
5 to the room for a massage?
6 MR. PAGLIUCA: Objection to the
7 form and foundation.
8 A. The police records you are
9 referring to?
10 Q. You are saying that didn't happen.
11 You're saying I can only testify to adults
12 that came for an interview and were led up to
13 the room. Why can't you testify to whether
14 an underage girl was brought in for an
15 interview and led up --
16 MR. PAGLIUCA: Objection to the
17 form and foundation.
18 Q. Go ahead.
19 A. Can you reask the question.
20 Q. Why can't you testify as to an
21 underage girl who came over for an interview
22 and then was then led up to the room for the
23 massage?
24 A. You've mangled your entire
25 question. Can you please reask that in a way

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2 present at the home when a girl under the age
3 of 18 came over for the purposes of giving a
4 massage?
5 MR. PAGLIUCA: Objection to the
6 form and foundation.
7 Q. You can answer.
8 A. You can be a professional masseuse
9 at 17 in Florida, so as far as I am aware, a
10 professional masseuse showed up for a
11 massage. There is nothing inappropriate or
12 incorrect about that and your
13 mischaracterization of it, I think is
14 unfortunate.
15 Q. How many teenagers did he have that
16 were professional masseuses that worked in
17 his home?
18 MR. PAGLIUCA: Objection to the
19 form and foundation.
20 Q. How many?
21 A. First of all, I am not aware of
22 teenagers who worked in his home.
23 Q. You are aware of Virginia Roberts
24 and you've stated she was 17 and she worked
25 for him, correct?

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2 A. No. I did not state that at all,
3 you are mischaracterizing my words and what I
4 said.
5 What I said was that we can all
6 agree and I think at this point there is not
7 one person in this room, however much you
8 would like her to be younger, to say she was
9 not 17 because that has been a very offensive
10 thing that you have all done. So she was 17.
11 At 17 you are allowed to be a professional
12 masseuse and as far as I'm concerned, she was
13 a professional masseuse. There is nothing
14 inappropriate or incorrect about her coming
15 at that time to give a massage. Her entire
16 characterization of her first time at the
17 house was to me an obvious lie, given it was
18 impossible for her entire story to take place
19 given I was speaking to her mother the entire
20 she was at the house.
21 Q. So it was impossible that day, that
22 first day she came and you were speaking to
23 the mother, for Virginia Roberts to have had
24 sex with Jeffrey Epstein during the time that
25 you were outside with her mother?

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2 absolutely 1000 percent that she did not have
3 any type of sexual relations as described by
4 you in your court papers that took place
5 because those allegedly according to her lies
6 involved some aspect of me.
7 As I was standing outside with her
8 mother the entire time, her entire story is a
9 lie. Therefore, to ask me what she did or
10 didn't do during that time, I can only
11 testify to what she said about me, which was
12 1000 percent false.
13 Q. So let's not take the first time,
14 let's take the next time she comes.
15 A. No no, how can do you that, when
16 the basis of this entire horrible story that
17 you have put out is based on this first
18 appalling story that was written, repeated,
19 multiply by the press that lied about her
20 age, lied about the first time she came, lied
21 about and characterized the entire first
22 time. I have been so absolutely appalled by
23 her story and appalled by the entire
24 characterization of it and I apologize
25 sincerely for my banging at the table

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2 earlier, I hope you accept my apology. It's
3 borne out of years of feeling the pressure of
4 this entire lie that she has perpetrated from
5 our first time and whilst I recognize that
6 was -- I hope you forgive me sincerely
7 because it was just the length of time that
8 that terrible story has been told and retold
9 and rehashed when I know it to be 100 percent
10 false.
11 Q. So not the first time she came, but
12 the second time she came or the third time or
13 any time she came, did you ever participate
14 in a massage with her in Jeffrey Epstein's
15 room?
16 A. I have never participated at any
17 time with Virginia in a massage with Jeffrey.
18 Q. Have you ever participated at any
19 time with Virginia in any kind of sexual
20 contact or sexual touching with Jeffrey and
21 Virginia?
22 A. I have not.
23 Q. So we were going through the list
24 of obvious lies and you were talking about
25 the first time which I believe we have

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2 of 18?
3 A. I think we can establish what adult
4 would be.
5 Q. You never interviewed or I know you
6 don't want to use the word hired, whatever
7 your role was, you brought in an exercise
8 instructor that was under the age of 18 to
9 work at the house?
10 MR. PAGLIUCA: Object to the form
11 and foundation.
12 A. I have already testified that what
13 I was responsible for was to find people who
14 had competencies in whatever area I was
15 looking for. The competencies I was looking
16 for were professional and adult.
17 Q. So there was no exercise instructor
18 that worked at the Palm Beach house or the
19 New York house or the New Mexico house or the
20 USVI under the age of 18?
21 MR. PAGLIUCA: Objection to the
22 form and foundation.
23 A. I can only testify to when I was at
24 the house.
25 Q. Yes.

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2 MR. PAGLIUCA: Objection to the
3 form and foundation.
4 A. That's not how I would characterize
5 that.
6 Q. How would you characterize it?
7 A. I have testified that I'm
8 responsible for finding professional people
9 to work in the homes, age appropriate adult
10 people, so from pool attendants, to
11 gardeners, to chefs, to housekeepers, to
12 butlers, to chauffeurs and one of the
13 functions was to be able to answer the
14 telephones and in the context of finding
15 someone to answer the telephones, I did look
16 to try to find appropriate people to answer
17 the phones.
18 Q. So did you find Johanna for
19 purposes of that role?
20 A. So in the course of looking for
21 somebody to answer phones at the house,
22 Johanna was one of the people who said that
23 she was willing to answer phones.
24 Q. Did you approach her at her school
25 campus?

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2 Q. List all of the girls you met and
3 brought to Jeffrey Epstein's home for the
4 purposes of employment that were under the
5 age of 18?
6 MR. PAGLIUCA: Objection to the
7 form and foundation.
8 A. I've already characterized my job
9 was to find people, adults, professional
10 people to do the jobs I listed before; pool
11 person, secretary, house person, chef, pilot,
12 architect.
13 Q. I'm asking about individuals under
14 the age of 18, not adult persons, people
15 under the age of 18.
16 A. I looked for people or tried to
17 find people to fill professional jobs in
18 professional situations.
19 Q. So Virginia Roberts was under the
20 age of 18, correct?
21 A. I think we've established that
22 Virginia was 17.
23 Q. Is she the -- sorry, go ahead.
24 Is she the only individual that you
25 met for purposes of hiring someone for

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2 MR. PAGLIUCA: Object to the form
3 and foundation.
4 A. If you want to ask Jeffrey
5 questions about me, you would have to ask
6 him.
7 Q. Have you ever been involved in any
8 illegal activity in your lifetime?
9 MR. PAGLIUCA: Objection to the
10 form and foundation.
11 A. I can't think of anything I have
12 done that is illegal.
13 Q. Have you ever been arrested?
14 A. I have a DUI in the U.K. a long
15 time ago.
16 Q. Is that the only arrest you have on
17 your record?
18 A. Yes.
19 Q. I will mark as Maxwell 22 this
20 email?
21 (Maxwell Exhibit 22, email, marked
22 for identification.)
23 Q. This is dated January 21, 2015.
24 It's from Jeffrey Epstein to you, forwarding
25 the Guardian and I would like you to look at

1

2 CERTIFICATE

3

4

5 I HEREBY CERTIFY that the witness,

6 GHISLAINE MAXWELL, was duly sworn by me and

7 that the deposition is a true record of the

8 testimony given by the witness.

9

10 ______________________________

11 Leslie Fagin,

Registered Professional Reporter

12 Dated: April 22, 2016

13

14

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Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- x
VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:
15-cv-07433-RWS

-against-

GHISLAINE MAXWELL,

Defendant.

- x

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Continued Videotaped Deposition of GHISLAINE MAXWELL, the Defendant herein, taken pursuant to subpoena, was held at the law offices of Boies, Schiller & Flexner, LLP, 575 Lexington Avenue, New York, New York, commencing July 22, 2016, 9:04 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

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1 G. Maxwell - Confidential
2 thought. I really don't recall her, so it's
3 hard for me to testify what I thought about
4 her age at the time.
5 Q. Was Virginia, in the period of
6 around 2000, the youngest person that, as you
7 understood it, was giving Mr. Epstein
8 massages?
9 MR. PAGLIUCA: Object to the form
10 and foundation.
11 A. Again, I can't testify to her age,
12 but everybody else that I can recall seemed
13 to be again, like I would say, adults.
14 Q. You didn't think Virginia was an
15 adult, did you?
16 MR. PAGLIUCA: Object to the form
17 and foundation.
18 A. Like I said, I don't recall her. I
19 don't recall thinking about -- my memory is
20 of adults giving Jeffrey massages, and as I
21 don't really remember Virginia around that
22 time, I don't know what I think.
23 Q. You do remember Virginia, about
24 that time back in the 2000s, giving
25 Mr. Epstein massages?

1 G. Maxwell - Confidential
2 MR. PAGLIUCA: Object to the form
3 and foundation.
4 A. I barely remember her at all.
5 Q. Whether you barely remember her or
6 not, you do remember that back in the period
7 around 2000, Virginia was giving Mr. Epstein
8 massages, right?
9 MR. PAGLIUCA: Objection to form
10 and foundation.
11 A. Only in the most general terms. It
12 would be somebody who would give him a
13 massage, and that's it.
14 Q. During the period of time back in
15 the period around 2000, when you knew that
16 Virginia was somebody who would give
17 Mr. Epstein a massage, was she somebody who
18 you considered an adult?
19 MR. PAGLIUCA: Objection to form
20 and foundation.
21 A. I didn't consider her at all
22 because she is not somebody that I really
23 interacted with.
24 Q. It is your testimony that Virginia
25 was not somebody that you interacted with, is

Confidential

Page 55

1 G. Maxwell - Confidential

2 Epstein's home in Palm Beach?

3 MR. PAGLIUCA: Objection to form

4 and foundation.

5 A. [REDACTED]

13 Q. [REDACTED]

1 G. Maxwell - Confidential

2 Q.

5 A.

7 A.

11 Q.

16

22

Page 57

1 G. Maxwell - Confidential

2 MR. PAGLIUCA: Objection to form

3 and foundation.

4 A.

8 MR. PAGLIUCA: Objection to form

9 and foundation.

10 A.

14 Q.

21

Confidential

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1 G. Maxwell - Confidential

2 Q. [REDACTED]

7 [REDACTED]

11 [REDACTED]

20 [REDACTED]

21 MR. PAGLIUCA: Objection to form

22 and foundation.

23 [REDACTED]

24 [REDACTED]

Confidential

Page 86

1 G. Maxwell - Confidential
2 and foundation.
3 A. No.
4 Q. ██████████
█ ██████████
█ ██████████
█ ██████
8 MR. PAGLIUCA: Objection to form
9 and foundation.
10 A. I don't know.
11 ██ ██████████
██ ██ ███
██ ██ ██████████
██ ██████████
██ ██████████
██ ██████████
17 MR. PAGLIUCA: Objection to form
18 and foundation. Asked and answered.
19 A. No.
20 Q. Were they ever in the Virgin
21 Islands?
22 MR. PAGLIUCA: Objection to form
23 and foundation.
24 A. No.
25 ██ ██████████

Confidential

Page 87

1

8

17

23

24 MR. PAGLIUCA: Objection to form

25 and foundation.

1 G. Maxwell - Confidential

2 it to something in the case.

3 MR. BOIES: I think it's tied, but

4 if you instruct her not to answer, it

5 goes into the --

6 MR. PAGLIUCA: Meat grinder.

7 BY MR. BOIES:

8 Q. [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

[redacted] [redacted].

14 A. Can you repeat the question?

15 Q. [redacted]

[redacted]

[redacted]

[redacted]

[redacted]

20 MR. PAGLIUCA: Same objection.

21 A. No.

22 Q. [redacted]

[redacted]

24 [redacted]

[redacted]

1

2 CERTIFICATE

3

4

5 I HEREBY CERTIFY that GHISLAINE

6 MAXWELL, was duly sworn by me and that the

7 deposition is a true record of the testimony

8 given by the witness.

9

10 ______________________________

11 Leslie Fagin,

Registered Professional Reporter

12 Dated: July 22, 2016

13

14

15 (The foregoing certification of

16 this transcript does not apply to any

17 reproduction of the same by any means, unless

18 under the direct control and/or supervision

19 of the certifying reporter.)

20

21

22

23

24

25

EXHIBIT 12
(Filed Under Seal)

GIUFFRE

VS.

MAXWELL

Deposition

LYNN TRUDE MILLER

05/24/2016

Agren Blando Court Reporting & Video, Inc.
216 16th Street, Suite 600
Denver Colorado, 80202
303-296-0017

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
LYNN TRUDE MILLER May 24, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

S.J. QUINNEY COLLEGE OF LAW, UNIVERSITY OF UTAH
By Paul G. Cassell, Esq.
383 S. University Street
Salt Lake City, UT 84112
Phone: 801.585.5202
Cassellp@law.utah.edu
Appearing on behalf of the
Plaintiff

HUTCHINSON BLACK AND COOK, LLC
By John Clune, Esq.
921 Walnut Street
Suite 200
Boulder, CO 80302
Phone: 303.442.6514
clune@hbcboulder.com
Appearing on behalf of the
Deponent

1 APPEARANCES: (Continued)
2
HADDON, MORGAN AND FORMAN, P.C.
3 By Laura A. Menninger, Esq.
Jeffrey S. Pagliuca, Esq.
4 150 East 10th Avenue
Denver, CO 80203
5 Phone: 303.831.7364
lmenninger@hmflaw.com
6 jpagliuca@hmflaw.com
Appearing on behalf of the
7 Defendant

8 Also Present:
Maryvonne Tompkins, Videographer
9

10

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1 A Because I wasn't told any different.
2 Q Do you know where any -- any source of
3 that information came from? Was it Sky?
4 A It came from Sky.
5 Q Okay. And what do you recall him telling
6 you about when Virginia stopped working at
7 Mar-a-Lago?
8 A She was in a discussion with Mrs. Maxwell
9 to educate her and take her under her wing and be her
10 new momma. That's what I heard.
11 Q Okay. And who told you that?
12 A Sky.
13 Q Okay. And do you remember when Sky told
14 you that?
15 A I don't remember.
16 Q Okay. Did you learn anything else about
17 that, other than what you just said?
18 A No.
19 Q Okay. Do you know where she went to work
20 after Mar-a-Lago?
21 A I think she went with Mrs. Maxwell.
22 Q But do you know where, physically?
23 A Physically, Sky and I dropped her off one
24 day at Mrs. Maxwell's. I did not speak with
25 Mrs. Maxwell. I didn't have anything to say to her.

1 STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)
4 I, Kelly A. Mackereth, do hereby certify
5 that I am a Registered Professional Reporter and
6 Notary Public within the State of Colorado; that
7 previous to the commencement of the examination, the
8 deponent was duly sworn to testify to the truth.
9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.
14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.
18 In witness whereof, I have affixed my
19 signature this 31st day of May, 2016.
20 My commission expires April 21, 2019.
21
22
Kelly A. Mackereth, CRR, RPR, CSR
23 216 - 16th Street, Suite 600
Denver, Colorado 80202
24
25

EXHIBIT 13
(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

--x
VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

June 21, 2016
9:17 a.m.

C O N F I D E N T I A L

Deposition of JOSEPH RECAREY, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. EDWARDS:
3 Q. All right.
4 Was SG a licensed massage therapist?
5 MR. PAGLIUCA: Object to form and
6 foundation.
7 THE WITNESS: No.
8 BY MR. EDWARDS:
9 Q. And at 14 years old, are you permitted to
10 be a licensed massage therapist?
11 A. Not to my knowledge.
12 Q. After speaking with SG and understanding
13 her account of what took place at Jeffrey Epstein's
14 home, what -- what happened next in the
15 investigation?
16 A. At some point the investigation was turned
17 over to me for follow-up. I know there was trash
18 pulled that was done prior to -- and surveillance
19 that was done prior to the case being turned over to
20 me; and trash pulls being an investigative technique
21 to acquire intelligence, information and evidence.
22 Q. Okay. If we go to page 17, at the top,
23 and, first of all, I will ask you from memory, do
24 you remember if [REDACTED] identified Jeffrey
25 Epstein in a photo lineup?

1 JOSEPH RECAREY - CONFIDENTIAL
2 "a cross-reference"?
3 A. Uh-huh.
4 Q. How is a cross-reference performed? What
5 does that mean?
6 A. When -- when something is
7 cross-referenced, they -- they jot down license
8 plate numbers. They conduct their background into
9 the individuals; photographs, computer research.
10 Q. A cross-reference of Jeffrey Epstein's
11 residence revealed which affiliated names?
12 A. It revealed Nadia Marcinkova, Ghislane
13 Maxwell, Mark Epstein. Also, the cross-reference,
14 any previous reports from the residence as well.
15 Q. During your investigation, did you learn
16 of any involvement that Nadia Marcinkova had with
17 any of the activities you were investigating?
18 MR. PAGLIUCA: Object to form and
19 foundation.
20 THE WITNESS: Yes.
21 BY MR. EDWARDS:
22 Q. And what involvement did you learn of
23 Nadia Marcinkova?
24 MR. PAGLIUCA: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL
2 THE WITNESS: Nadia was involved sexually
3 with one of the victims at Epstein's request.
4 BY MR. EDWARDS:
5 Q. Okay. Do you remember which victim you're
6 remembering right now?
7 A. AH.
8 Q. Okay. If it indicates in the report that
9 she was also sexually involved with other victims,
10 is that possible as well?
11 A. Yes.
12 MR. PAGLIUCA: Object to form and
13 foundation.
14 BY MR. EDWARDS:
15 Q. Okay. The one that you remember in your
16 mind is AH?
17 MR. PAGLIUCA: Object to form and
18 foundation.
19 THE WITNESS: Correct.
20 BY MR. EDWARDS:
21 Q. The other name that is on here as a
22 cross-reference is Ghislane Maxwell.
23 Did you speak with Ghislane Maxwell?
24 A. I did not.
25 Q. Did you ever attempt to speak with

1 JOSEPH RECAREY - CONFIDENTIAL
2 Ghislane Maxwell?
3 A. I wanted to speak with everyone related to
4 this home, including Ms. Maxwell. My contact was
5 through Gus, Attorney Gus Fronstin, at the time, who
6 initially had told me that he would make everyone
7 available for an interview. And subsequent
8 conversations later, no one was available for
9 interview and everybody had an attorney, and I was
10 not going to be able to speak with them.
11 Q. Okay. During your investigation, what did
12 you learn in terms of Ghislane Maxwell's
13 involvement, if any?
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 THE WITNESS: Ms. Maxwell, during her
17 research, was found to be Epstein's long-time
18 friend. During the interviews, Ms. Maxwell was
19 involved in seeking girls to perform massages
20 and work at Epstein's home.
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 BY MR. EDWARDS:
24 Q. Did you interview -- how many girls did
25 you interview that were sought to give or that

1 JOSEPH RECAREY - CONFIDENTIAL
2 actually gave massages at Epstein's home?
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 BY MR. EDWARDS:
6 Q. Approximately.
7 MR. PAGLIUCA: Same objection.
8 THE WITNESS: I would say approximately
9 30; 30, 33.
10 BY MR. EDWARDS:
11 Q. And of the 30, 33 or so girls, how many
12 had massage experience?
13 MR. PAGLIUCA: Object to form and
14 foundation.
15 THE WITNESS: I believe two of them may
16 have been -- two of them.
17 BY MR. EDWARDS:
18 Q. Okay. And as we go through this report,
19 you may remember the names?
20 A. Correct. Let me correct myself. I
21 believe only one had.
22 Q. And was that -- was that one of similar
23 age to the other girls?
24 MR. PAGLIUCA: Object to form and
25 foundation.

1 JOSEPH RECAREY - CONFIDENTIAL
2 foundation.
3 THE WITNESS: Yes, I did.
4 BY MR. EDWARDS:
5 Q. And were trash pulls done at the property
6 of Jeffrey Epstein?
7 A. Yes.
8 Q. What is the purpose of a trash pull, and
9 what is a trash pull?
10 A. A trash pull is when property is
11 discarded, such as trash, we coordinate with the
12 sanitation department to collect the trash, once it
13 leaves the property, and it's put into an empty well
14 of the trash truck. We acquire the bags, and we
15 sift through the contents of the trash.
16 Q. Did you or another detective from the unit
17 observe each step of the trash pull to make sure
18 that you had a good chain of custody of the
19 evidence?
20 MR. PAGLIUCA: Object to form and
21 foundation.
22 THE WITNESS: Yes. The members of
23 the OCTAN unit at that time did.
24 BY MR. EDWARDS:
25 Q. Okay. And what is that process?

1 JOSEPH RECAREY - CONFIDENTIAL
2 A. The process --
3 MR. PAGLIUCA: Object to form and
4 foundation.
5 THE WITNESS: The process is when the --
6 once you coordinate a trash pull with the
7 sanitation supervisor, you meet with the
8 sanitation worker and ensure that either the
9 can that he's going to place in the well is
10 completely empty and you physically observe him
11 collect the trash and place it into the empty
12 container. And then you follow him to a
13 disclosed area, and we retrieve the bags and
14 you sift through the trash.
15 BY MR. EDWARDS:
16 Q. Okay. What were you looking for in terms
17 of evidentiary value from these trash pulls?
18 MR. PAGLIUCA: Object to form and
19 foundation.
20 THE WITNESS: We were looking for any --
21 any form of identification. You were looking
22 for -- to gather any kind of intelligence
23 and/or evidence.
24 BY MR. EDWARDS:
25 Q. Okay. If we go to page 20 of the report,

1 JOSEPH RECAREY - CONFIDENTIAL
2 I guess I'll start with where it says on 4/4/2005, I
3 just want to ask you, was a voice mail message taken
4 into evidence from HR to SG?
5 A. Yes.
6 Q. Okay. And the purpose of that evidence is
7 to corroborate what?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: It was actually a phone call
11 from HR to SG confirming an appointment to go
12 work at Epstein's residence.
13 BY MR. EDWARDS:
14 Q. The next line down is what I wanted to
15 focus on, April 5th, 2005.
16 This trash pull, what evidence is yielded
17 from this particular trash pull?
18 MR. PAGLIUCA: Object to form and
19 foundation.
20 THE WITNESS: The trash pull indicated
21 that there were several messages with written
22 items on it. There was a message from HR
23 indicating that there would be an 11:00
24 appointment. There were other individuals that
25 had called during that day.

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. EDWARDS:
3 Q. And when you would -- when you would see
4 females' names and telephone numbers, would you take
5 those telephone numbers and match it to -- to a
6 person?
7 MR. PAGLIUCA: Object to form and
8 foundation.
9 THE WITNESS: We would do our best to
10 identify who that person was.
11 BY MR. EDWARDS:
12 Q. And is that one way in which you
13 discovered the identities of some of the other what
14 soon came to be known as victims?
15 MR. PAGLIUCA: Object to form and
16 foundation.
17 THE WITNESS: Correct.
18 BY MR. EDWARDS:
19 Q. Okay. There's the second paragraph from
20 the bottom, it starts, "Detective Leigh provided
21 trash from 4/06, 4/07/2005."
22 Do you see that?
23 A. Yes.
24 Q. And what is the purpose of the indication
25 that "the following information was retrieved: Jet

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. EDWARDS:
3 Q. And then some of the remaining messages,
4 "Johanna, work Sunday at 4 p.m.; A, Monday after
5 school; left message for Courtney W and NT," are
6 these individuals that you later learned were
7 underaged girls that had been to Jeffrey Epstein's
8 home?
9 MR. PAGLIUCA: Object to form and
10 foundation.
11 THE WITNESS: That's correct.
12 BY MR. EDWARDS:
13 Q. What types of documents do you remember
14 retrieving from the trash pulls from Jeffrey
15 Epstein's home?
16 A. There was numerous items. It was a lot of
17 handwritten notes on different -- different pads of
18 paper. Some of the pads had names on it, whether it
19 was Epstein, whether it was Ghislane Maxwell,
20 whether it was -- there were phone messages.
21 When I say "phone messages," I mean, you
22 know, the kind that come in a book. They are carbon
23 copied, so the yellow copy always stays with the
24 book, but the white copy is torn off. So there was
25 always a carbon copy of the actual phone message.

1 JOSEPH RECAREY - CONFIDENTIAL
2 THE WITNESS: Correct.
3 BY MR. EDWARDS:
4 Q. And let me go back to the beginning six
5 pages of that exhibit, No. 4.
6 MR. PAGLIUCA: Why don't we just make a
7 copy of it now if we're going to ask questions
8 about it? I'm not trying to --
9 MR. EDWARDS: Yes, I know. It's just the
10 first six pages.
11 (A discussion was held off the record,
12 after which the following proceedings were
13 held:)
14 THE VIDEOGRAPHER: On the record at 10:32.
15 BY MR. EDWARDS:
16 Q. And what were some of the items that were
17 found in -- well, are the documents that you're
18 holding, 1 through 6, an accurate reflection of the
19 items that were found in Jeffrey Epstein's home
20 during the search warrant execution?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Yes.
24 BY MR. EDWARDS:
25 Q. And I believe that you described that some

1 JOSEPH RECAREY - CONFIDENTIAL
2 of the -- that the house appeared to be -- I don't
3 remember the word you used -- sanitized, for lack of
4 a better word?
5 MR. PAGLIUCA: Object to form and
6 foundation.
7 BY MR. EDWARDS:
8 Q. How did you know that?
9 A. The computers had been removed from the
10 home.
11 Q. How did you know the computers were
12 removed?
13 A. Based on -- based on the dangling wires
14 left behind, the monitors left, but the actual CPU
15 of it was missing.
16 When you went into the bedroom of Jeffrey
17 Epstein, everything was removed from the -- the
18 shelves, from the armoire.
19 Q. Did you find nude photographs of girls?
20 A. Yes.
21 Q. All right.
22 And what did you do with that evidence?
23 A. That was collected and placed into our
24 crime scene unit.
25 Q. And where is that evidence today?

1 JOSEPH RECAREY - CONFIDENTIAL
2 A. Any evidence that was not returned to its
3 rightful owner was turned over to the FBI.
4 Q. And evidence which would be nude
5 photographs of girls would be evidence not turned
6 back over to Epstein?
7 A. Correct.
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 THE WITNESS: Some of the items that were
11 collected were later found to be personal items
12 of the houseman, Janush. I recall reviewing
13 his personal photographs on -- on a micro SD
14 card for, like, photos of him and his wife or
15 girlfriend at the time.
16 BY MR. EDWARDS:
17 Q. And the underaged girls that you had
18 spoken with during your investigation, had they
19 described seeing photographs of naked girls in the
20 house?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Yes, they did.
24 BY MR. EDWARDS:
25 Q. That's something that ran consistent with

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. EDWARDS:
3 Q. Okay. Also reflected are the property
4 receipts?
5 MR. PAGLIUCA: Object to form and
6 foundation.
7 THE WITNESS: Correct.
8 BY MR. EDWARDS:
9 Q. All right.
10 And where were those taken from, in terms
11 of whose property is that?
12 MR. PAGLIUCA: Object to form and
13 foundation.
14 THE WITNESS: This would have been taken
15 from the home of Jeffrey Epstein.
16 BY MR. EDWARDS:
17 Q. And in reviewing that evidence, were you
18 able to substantiate or corroborate certain victims'
19 accounts of their allegations of having been at the
20 house?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Correct.
24 BY MR. EDWARDS:
25 Q. Did you find names of other witnesses and

1 JOSEPH RECAREY - CONFIDENTIAL
2 people that you knew to have been associated with
3 the house in those message pads?
4 MR. PAGLIUCA: Object to form and
5 foundation.
6 THE WITNESS: Yes.
7 BY MR. EDWARDS:
8 Q. And so what was the evidentiary value to
9 you of the message pads collected from Jeffrey
10 Epstein's home in the search warrant?
11 MR. PAGLIUCA: Object to form and
12 foundation.
13 THE WITNESS: It was very important to
14 corroborate what the victims had already told
15 me as to calling in and for work.
16 BY MR. EDWARDS:
17 Q. Okay. And did you learn the identities of
18 some of the other individuals associated with
19 Jeffrey Epstein through the review of that
20 particular evidence?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Correct.
24 BY MR. EDWARDS:
25 Q. Okay. And what did you do with that

1 JOSEPH RECAREY - CONFIDENTIAL
2 BY MR. EDWARDS:
3 Q. In these messages, did you see messages
4 that were taken by Ghislane Maxwell or left for
5 Ghislane Maxwell?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: I do recall seeing messages
9 utilizing her pad, her stationery.
10 BY MR. EDWARDS:
11 Q. Okay. Do you remember messages
12 specifically that Ms. Maxwell, she is home, or calls
13 for Ms. Maxwell, or indicating that the person
14 taking the message is GM? Do you remember those?
15 A. Yes.
16 MR. PAGLIUCA: Object to form and
17 foundation.
18 BY MR. EDWARDS:
19 Q. And did that give you further reason to
20 want to speak to Ghislane Maxwell?
21 MR. PAGLIUCA: Object to form and
22 foundation.
23 THE WITNESS: Correct. I wanted to speak
24 with everyone in the home and everyone
25 associated with Jeffrey Epstein.

1 JOSEPH RECAREY - CONFIDENTIAL
2 anything that's found that has any kind of
3 identifiers, any kind of names, phone numbers,
4 anything that could be used to identify further
5 victims and/or to corroborate what the information
6 we already obtained, that information would be kept.
7 Q. Okay.
8 A. Be followed up on.
9 Q. You testified earlier about certain pieces
10 of paper that had Ghislane Maxwell's name on it that
11 were obtained.
12 Are the documents that are listed, the
13 first one, two, three, four pages of Exhibit 8, some
14 of the documents that you're referring to?
15 MR. PAGLIUCA: Object to form and
16 foundation.
17 THE WITNESS: That is correct.
18 BY MR. EDWARDS:
19 Q. And if we go through this stack of
20 documents, if you could just review them and tell me
21 if these are some of the items obtained through the
22 trash pulls at Jeffrey Epstein's home?
23 MR. PAGLIUCA: Object to form and
24 foundation.
25 THE WITNESS: That is correct. This is --

1 JOSEPH RECAREY - CONFIDENTIAL
2 these items were collected in the trash pull.
3 BY MR. EDWARDS:
4 Q. Okay. And these are items that you felt
5 had some evidentiary value?
6 MR. PAGLIUCA: Object to form and
7 foundation.
8 THE WITNESS: Yes.
9 BY MR. EDWARDS:
10 Q. Were there other items within the trash
11 that were discarded as not having any apparent
12 evidentiary value?
13 A. Correct. There was stuff like food trash
14 we're not going to keep. You know, an apple core.
15 None of that's going to be kept.
16 Q. Okay. And when you took this stuff into
17 evidence, how was it maintained?
18 A. It was placed in a -- in a sealed
19 container, a sealed Ziploc, and placed into
20 evidence.
21 Q. And then was that file later transferred
22 to the State Attorney's Office or the FBI?
23 MR. PAGLIUCA: Object to form and
24 foundation.
25 THE WITNESS: It was collected by the FBI.

2

3 C E R T I F I C A T E

4 STATE OF FLORIDA)

: ss

5 COUNTY OF MIAMI-DADE)

6 I, KELLI ANN WILLIS, a Registered

7 Professional, Certified Realtime Reporter and

8 Notary Public within and for The State of

9 Florida, do hereby certify:

10 That JOSEPH RECAREY, the witness whose

11 deposition is hereinbefore set forth was duly

12 sworn by me and that such Deposition is a true

13 record of the testimony given by the witness.

14 I further certify that I am not related

15 to any of the parties to this action by blood

16 or marriage, and that I am in no way interested

17 in the outcome of this matter.

18 IN WITNESS WHEREOF, I have hereunto set

19 my hand this 24th day of June, 2016.

20

21 ______________________________

KELLI ANN WILLIS, RPR, CRR

22

23

24

25

EXHIBIT 14
(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK
- x
VIRGINIA L. GIUFFRE,

Plaintiff,

Case No.:
-against- 15-cv-07433-RWS

GHISLAINE MAXWELL,

Defendant.

- x

CONFIDENTIAL

Videotaped deposition of RINALDO RIZZO, taken pursuant to subpoena, was held at the law offices of Boies Schiller & Flexner, 333 Main Street, Armonk, New York, commencing June 10, 2016, 10:06 a.m., on the above date, before Leslie Fagin, a Court Reporter and Notary Public in the State of New York.

- - -

MAGNA LEGAL SERVICES
1200 Avenue of the Americas
New York, New York 10026
(866) 624-6221

1 R. Rizzo - Confidential
2 even Nadia. And what I found very repulsive,
3 out of the ordinary, was Nadia was wearing a
4 swimsuit that was very revealing and
5 basically, her bottom basically went up her
6 butt, revealing all of her buttocks. So
7 again, in the context not very appropriate
8 for the situation.
9 Q. Could you tell the relationship of
10 age between the three girls that you have
11 described and Nadia, for instance?
12 MR. PAGLIUCA: Object to the form
13 and foundation.
14 A. Nadia seemed to be a bit older, I
15 would say.
16 Q. How does this end, or is there,
17 what do you do next? How does this meeting
18 that you've just described break up?
19 A. I asked to excuse myself and asked
20 where the bathroom was, so I'm pointed inside
21 the house, to go inside the house to the
22 bathroom.
23 I walk in there, and I walk, as I'm
24 walking to the bathroom, what caught my eye,
25 and I had to take a double lock, there were

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2 pictures of naked women, half-dressed girls.
3 So I went to the bathroom, again, from
4 someone, myself working in private service, I
5 always know in houses there are cameras, so
6 again, I was very reluctant to stare, because
7 you never know when you are on camera.
8 So I used the bathroom, and I came
9 out, and you know, curiosity got the best of
10 me, and I leaned over and started looking at
11 these pictures for a brief minute, and it was
12 just so coincidental that as I did that, Ms.
13 Maxwell enters, and she immediately says to
14 me that Jeffrey would like for me to rejoin
15 the party immediately.
16 Q. How many pictures of nude females
17 did you see in Jeffrey Epstein's home?
18 MR. PAGLIUCA: Object to the form
19 and foundation.
20 A. I can't recall the exact number.
21 Q. Can you describe the pictures that
22 you saw in terms of what the people, what the
23 people or person within the picture was
24 wearing, what the age range would be of the
25 person that's in the photograph, any poses,

1 R. Rizzo - Confidential
2 Q. Did you learn whether your
3 perception was correct?
4 MR. PAGLIUCA: Same objection.
5 A. It was younger. Yes, I did.
6 Q. How old was this girl?
7 A. 15 years old.
8 Q. What happens next when Ghislaine
9 Maxwell and Jeffrey Epstein and a 15-year-old
10 girl walk into Eva Anderson's home?
11 MR. PAGLIUCA: Object to the form.
12 Foundation.
13 A. They proceed into the dining room
14 area, which is across from the living room
15 area. I go into the kitchen and I hear a
16 conversation start. Very muffled, I could
17 not hear any particulars about the
18 conversation whatsoever.
19 My wife and I are in the kitchen
20 preparing the evening meal. Eva brings the
21 young girl into the kitchen. In the kitchen,
22 there is an island with three barstools. Eva
23 instructs the young girl to sit to the
24 furthest barstool on the right.
25 Q. Describe for me what the girl

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2 looked like, including her demeanor and
3 anything else you remember about her when she
4 walks into the kitchen.
5 A. Very attractive, beautiful young
6 girl. Makeup, very put together, casual
7 dress. But she seemed to be upset, maybe
8 distraught, and she was shaking, and as she
9 sat down, she sat down and sat in the stool
10 exactly the way the girls that I mentioned to
11 you sat at Jeffrey's house, with no
12 expression and with their head down. But we
13 could tell that she was very nervous.
14 Q. What do you mean by distraught and
15 shaking, what do you mean by that?
16 A. Shaking, I mean literally
17 quivering.
18 Q. What happens next?
19 A. We were, again, the absurdity,
20 never introduced. Like you would walk into a
21 room and say this is -- so my wife and I are
22 in the kitchen and this young girl is sitting
23 there. It was a very uncomfortable moment.
24 I look at my wife. And so I want to ease the
25 moment, and so I introduced myself and I

1 R. Rizzo - Confidential
2 introduced my wife, and she doesn't really
3 respond.
4 And I asked her, are you okay? And
5 she doesn't really respond. Nothing verbal,
6 no cues, her head is still down. I ask her
7 if she would like some water, tissue,
8 anything, and she basically doesn't respond.
9 Q. You ask her for a tissue?
10 A. If she would like a tissue or some
11 water at the time.
12 Q. Was she crying at the time?
13 A. My perception, she was on the verge
14 of crying. And I'm trying to loosen the
15 situation every way I know how, so the only
16 way I knew how, and I thought maybe this will
17 comfort her, I said oh, by the way, do you
18 work for Jeffrey.
19 And she says that, I guess kind of
20 made her feel comfortable, because maybe it
21 was that comment or my persistence, and she
22 said yes. So I said, what do you do? And
23 she says I'm Jeffrey's executive assistant,
24 personal assistant. Which, from looking at
25 her, just didn't seem to suit.

1 R. Rizzo - Confidential
2 And I blurted out: You're his
3 executive personal assistant? What do you
4 do? And she says I was hired as his
5 executive personal assistant. I schedule his
6 appointments.
7 And I'm shocked, and I blurt out:
8 You seem quite young, how did you get a job?
9 How old are you? And she says to me, point
10 blank: I'm 15 years old.
11 And I said to her: You're 15 years
12 old and you have a position like that? At
13 that point she just breaks down hysterically,
14 so I feel like I just said something wrong,
15 and she will not stop crying. My wife and I
16 were at a loss for words, and I keep on
17 trying to console her, and nothing I was
18 saying, are you all right, do you need a
19 tissue, do you need water, consoles her.
20 And then in a state of shock, she
21 just lets it rip, and what she told me was
22 just unbelievable.
23 Q. What did she say?
24 MR. PAGLIUCA: Object to the form
25 and foundation.

1 R. Rizzo - Confidential
2 A. She proceeds to tell my wife and I
3 that, and this is not -- this is blurting
4 out, not a conversation like I'm having a
5 casual conversation. That quickly, I was on
6 an island, I was on the island and there was
7 Ghislaine, there was Sarah, she said they
8 asked me for sex, I said no.
9 And she is just rambling, and I'm
10 like what, and she said -- I asked her, I
11 said what? And she says yes, I was on the
12 island, I don't know how I got from the
13 island to here. Last afternoon or in the
14 afternoon I was on the island and now I'm
15 here. And I said do you have a -- this is
16 not making any sense to me, and I said this
17 is nuts, do you have a passport, do you have
18 a phone?
19 And she says no, and she says
20 Ghislaine took my passport. And I said what,
21 and she says Sarah took her passport and her
22 phone and gave it to Ghislaine Maxwell, and
23 at that point she said that she was
24 threatened. And I said threatened, she says
25 yes, I was threatened by Ghislaine not to

1 R. Rizzo - Confidential
2 discuss this.
3 And I'm just shocked. So the
4 conversation, and she is just rambling on and
5 on, again, like I said, how she got here, she
6 doesn't know how she got here. Again, I
7 asked her, did you contact your parents and
8 she says no.
9 At that point, she says I'm not
10 supposed to talk about this. I said, but I
11 said: How did you get here. I don't
12 understand. We were totally lost for words.
13 And she said that before she got
14 there, she was threatened again by Jeffrey
15 and Ghislaine not to talk about what I had
16 mentioned earlier, about -- again, the word
17 she used was sex.
18 Q. And during this time that you're
19 saying she is rambling, is her demeanor
20 continues to be what you described it?
21 A. Yes.
22 Q. Was she in fear?
23 A. Yes.
24 MR. PAGLIUCA: Object to the form
25 and foundation.

1 R. Rizzo - Confidential
2 Q. You could tell?
3 A. Yes.
4 MR. PAGLIUCA: Same objection.
5 A. She was shaking uncontrollably.
6 Q. What happens with this 15-year-old
7 girl next?
8 MR. PAGLIUCA: Object to the form
9 and foundation.
10 A. As she is trying to explain, and
11 I'm asking questions because I'm as feared as
12 she is at this point. We hear people
13 approach and she just shuts up.
14 Q. What happens next?
15 A. Eva comes in and tells her that she
16 will be working for Eva in the city.
17 Q. As what?
18 A. As a nanny.
19 Q. Did you see this girl again?
20 A. Yes.
21 Q. And when?
22 A. On a flight maybe a month or so to
23 Sweden.
24 Q. What was the purpose of the flight?
25 A. We were going to Sweden for the

1 R. Rizzo - Confidential
2 summer.
3 Q. Who was on the flight?
4 A. The Dubin family.
5 Q. As well as this girl?
6 A. Yes.
7 Q. What happens?
8 A. One thing that I forgot to mention
9 is during our initial conversation, I asked
10 her what her name was [redacted] she said her name
11 was [redacted]
12 Q. What happened with [redacted]?
13 A. We flew to Sweden, we stopped at an
14 airport that we didn't usually stop at and
15 she got off the plane.
16 Q. Just so that I make sure I
17 understand, who it was that she says asked
18 her for sex on the island, who was that?
19 MR. PAGLIUCA: Object to the form.
20 Foundation.
21 A. She didn't specify who asked for
22 sex. She said that they asked for sex.
23 Immediately after that she put Ghislaine and
24 Sarah into the conversation.
25 Q. Taking her passport?

1 R. Rizzo - Confidential
2 A. Yes.
3 Q. From -- are there any other
4 incidents or occurrences that you observed
5 personally with Jeffrey Epstein and Ghislaine
6 Maxwell?
7 MR. PAGLIUCA: Object to the form
8 and foundation.
9 A. Not that I can recall.
10 Q. This last event that you described,
11 what's the timeframe when that occurred?
12 A. Late 2004, 2005.
13 Q. When did you resign your employment
14 from the Dubin family?
15 A. I think roughly October.
16 Q. Of what year?
17 A. 2005.
18 Q. Why?
19 A. My wife and I had discussed these
20 incidents, and this last one was just, we
21 couldn't deal with it.
22 Q. When you left your employment with
23 the Dubin family, did you have a job?
24 A. When we finally left, I stayed on
25 three months after my resignation, I had a

1

2 CERTIFICATE

3

4

5 I HEREBY CERTIFY that RINALDO

6 RIZZO, was duly sworn by me and that the

7 deposition is a true record of the testimony

8 given by the witness.

9

10 ______________________________________

11 Leslie Fagin,

Registered Professional Reporter

12 Dated: June 10, 2016

13

14

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16 this transcript does not apply to any

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EXHIBIT 15
(Filed Under Seal)

Confidential

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

--x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

June 3, 2016
9:07 a.m.

C O N F I D E N T I A L

Deposition of DAVID RODGERS, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 DAVID RODGERS
2 flyer person, then you would reduce it to an
3 initial?
4 MR. PAGLIUCA: Object to form and
5 foundation.
6 MR. REINHART: You can answer the
7 question.
8 You can answer the question, if you can
9 answer the question. You are allowed to answer
10 the question, if you understand the question.
11 BY MR. EDWARDS:
12 Q. I'm trying to understand your testimony.
13 Is it, if you came to know that person --
14 A. Uh-huh.
15 Q. -- as a frequent flyer passenger, you
16 would begin to reduce that person's name to an
17 initial at some point?
18 MR. PAGLIUCA: Same objection.
19 THE WITNESS: Well, we don't really have a
20 frequent flyer program that we do, so to speak.
21 A lot of times I would do it because if you
22 would write out everybody's name there is not
23 enough space, you know, to get everybody's name
24 in that little square there.
25

1 DAVID RODGERS
2 Q. -- is that right?
3 And is that -- is Ghislaine Maxwell
4 somebody that through the years 1995 through 2013
5 was somebody who flew very frequently?
6 A. What were the years again?
7 Q. The years of this book, 1995 --
8 A. I wouldn't say through 2013. But, yes,
9 '95 through 2000 sometime. Probably, I would have
10 to go back and -- well, you can see in there.
11 Q. We will get to it.
12 A. There will be a point where you don't see
13 her much. But to say it went through 2013 would not
14 be accurate.
15 Q. Let's do it this way: The person that you
16 have reflected on numerous notations --
17 A. Yes.
18 Q. -- through here as GM --
19 A. Yes.
20 Q. -- just by the initials, are we able to
21 safely know that that is Ghislaine Maxwell?
22 A. Yes.
23 MR. PAGLIUCA: Object to form and
24 foundation.
25 MR. EDWARDS: Court reporter, did you get

1 DAVID RODGERS
2 the answer?
3 THE REPORTER: Yes. The answer came
4 before the objection.
5 BY MR. EDWARDS:
6 Q. So on the next flight, the next day, from
7 Palm Beach to SAF. Is SAF Santa Fe?
8 A. Yes.
9 Q. And it indicates JE and GM.
10 Are we able to then know that those
11 passengers on that flight were Jeffrey Epstein and
12 Ghislaine Maxwell?
13 A. Yes.
14 MR. PAGLIUCA: Object to form and
15 foundation.
16 BY MR. EDWARDS:
17 Q. And where would you land at SAF? Is that
18 an airport?
19 A. It is an airport.
20 Q. Is it a private airport?
21 A. No. It's -- airlines go in there.
22 Q. Did Jeffrey Epstein also have a landing
23 strip at his property in New Mexico?
24 A. He did at one time.
25 Q. What would that -- do you remember what

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1 DAVID RODGERS
2 that code would be?
3 A. I don't believe there was a code.
4 Q. All right. Were there times that you
5 landed either the Gulfstream or the Boeing --
6 A. No.
7 Q. No.
8 MR. REINHART: Let him finish the question
9 before you answer.
10 THE WITNESS: Oh, I'm sorry.
11 BY MR. EDWARDS:
12 Q. Sure. We are doing fine so far. But the
13 court reporter is taking down all of our questions
14 and all of our answers. We are communicating well.
15 A. Okay.
16 Q. But when I go to read this back, we may
17 not get that.
18 A. Okay. Go ahead.
19 Q. So were there times where you landed one
20 of Jeffrey Epstein's planes on his private landing
21 strip at the New Mexico property?
22 A. Yes. But not the Gulfstream and not the
23 Boeing.
24 Q. What plane did you land on his property?
25 A. The Cessna 421. And probably a

1 DAVID RODGERS
2 9:00, so it is 20 to 11:00 here.
3 BY MR. EDWARDS:
4 Q. So I want to go to page 41, and down to
5 December 9th. Sorry. December 11.
6 A. Okay.
7 Q. Palm Beach to Teterboro.
8 A. Yeah.
9 Q. And who are the passengers?
10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Virginia.
12 Q. And this appears to be the first time that
13 Virginia's name appears in the log?
14 A. Right.
15 Q. Is there a -- is there a reason why the
16 first time -- I notice that the first time on some
17 of the other passengers, you use a first and last
18 name. Is there any reason why you didn't use her
19 first and last name?
20 A. I probably didn't know her last name.
21 Q. Just didn't catch it.
22 A. Yes.
23 Q. Okay. It was not that somebody told you
24 not to use the last name?
25 A. No. No.

1 DAVID RODGERS
2 Q. So that flight goes from Palm Beach to
3 Teterboro.
4 Can you remember whether that's the first
5 time that you flew on a plane with Virginia Roberts?
6 MR. PAGLIUCA: Object to --
7 THE WITNESS: I believe it is.
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 BY MR. EDWARDS:
11 Q. Do you remember the flight?
12 A. No.
13 Q. The next flight three days later goes from
14 Teterboro to Virgin Islands with Jeffrey Epstein,
15 Ghislaine Maxwell, Adam Perry Lang, and Virginia; is
16 that right?
17 A. Yes.
18 Q. And below that, it says, "Reposition."
19 What does that mean?
20 A. We were taking the airplane with no
21 passengers to go into maintenance, or an OPS2
22 inspection.
23 Q. Okay. This is -- this is the same
24 Gulfstream, is that right?
25 A. Yes.

1 DAVID RODGERS
2 Q. How many passengers would that Gulfstream
3 allow?
4 A. Twelve passengers, I believe.
5 Q. And do you know how Jeffrey Epstein,
6 Ghislaine Maxwell, Adam Perry Lang, and Virginia get
7 off of St. Thomas or leave the island?
8 A. No. I do not. Probably a charter, I'm
9 guessing.
10 Q. If -- who would fly the -- well, is there
11 any other plane that Jeffrey Epstein was able to
12 access back then that was a private plane?
13 MR. PAGLIUCA: Object to foundation.
14 THE WITNESS: No. At that point in time
15 we don't have the Boeing yet.
16 BY MR. EDWARDS:
17 Q. So how many airplanes did Jeffrey Epstein
18 back then?
19 A. Well, we -- I don't know if we had the 421
20 then. We may or may not have. But it wouldn't --
21 you know, you wouldn't be flying the 421 down to
22 St. Thomas with Jeffrey. It is too long of a
23 flight.
24 Q. The Cessna?
25 A. The Cessna 421, correct.

1 DAVID RODGERS
2 Q. Okay.
3 A. But I'm not even sure we still had it at
4 this point in time.
5 Q. Yeah. It shows up on the next page. We
6 will get there.
7 A. Does it? Okay.
8 So then, yes, the answer is, yeah, we
9 still had the airplane. But we wouldn't have used
10 that.
11 Q. So is there any way of telling how Jeffrey
12 Epstein, Ghislaine Maxwell, Adam Perry Lang, and
13 Virginia were in the Virgin Islands on that, from
14 December 14th, 2000 --
15 MR. PAGLIUCA: Object to foundation.
16 BY MR. EDWARDS:
17 Q. -- based on your knowledge or your logs or
18 anything else?
19 A. No, I wouldn't have any way of knowing.
20 Q. Okay.
21 A. Because the next flight that they are on
22 was like this Palm Beach one, January 16th. So I
23 wouldn't have any idea.
24 Q. Okay. To your knowledge, did Jeffrey
25 Epstein ever fly commercially?

1 DAVID RODGERS
2 A. He probably has. Back then at this time,
3 I'm going to say probably not. But I know that he
4 has flown commercially. But usually that would be
5 like going to Europe, maybe.
6 Q. Okay. January 16th through the 25th,
7 those flights, do you see that block that I'm
8 talking about?
9 A. Yes.
10 Q. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, and then at times Shelly Lewis, do you see
12 that?
13 A. Yes, right.
14 Q. The 25th it lands in Teterboro. And the
15 next day, on the 26th, leaves out of Teterboro with
16 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
17 Virginia Roberts. This time you wrote the whole
18 name.
19 A. Right. Right.
20 Q. So when you write the full name, does that
21 signify -- that's when you may have learned her last
22 name?
23 A. Correct.
24 Q. And do you know how she -- how she got up
25 to New Jersey or New York?

1 DAVID RODGERS
2 A. I do not. I would guess the airlines.
3 Q. At this point in time, did you know what
4 her -- what her relationship was with Jeffrey
5 Epstein or Ghislaine Maxwell?
6 MR. PAGLIUCA: Object to form.
7 THE WITNESS: No.
8 BY MR. EDWARDS:
9 Q. Did you -- was she a masseuse?
10 MR. PAGLIUCA: Object to foundation.
11 THE WITNESS: I -- I'm not sure what she
12 was.
13 BY MR. EDWARDS:
14 Q. Did you form any -- any belief that she
15 was a friend or a business associate or anything?
16 MR. PAGLIUCA: Object to foundation.
17 THE WITNESS: Well, I mean, we had a lot
18 of people on the airplane. And Virginia was
19 just another one of those passengers.
20 BY MR. EDWARDS:
21 Q. Okay. So on the 26th, flies to Palm
22 Beach. And then -- and then I guess the 27th --
23 A. Right.
24 Q. -- leaves from Palm Beach to the Virgin
25 Islands --

1 DAVID RODGERS
2 A. Yes.
3 Q. -- with Jeffrey Epstein, Ghislaine
4 Maxwell, Emmy Tayler, and Virginia Roberts, right?
5 A. Yes.
6 Q. And on the 30th, you fly it back. That's
7 still the Gulfstream, right?
8 A. Yes.
9 Q. From the Virgin Islands to Palm Beach with
10 the same four passengers, correct?
11 A. Yes.
12 Q. And that's Jeffrey Epstein, Ghislaine
13 Maxwell, Emmy Tayler, and Virginia Roberts?
14 A. Correct.
15 Q. And then what happens to that plane, the
16 Gulfstream, for the next month, from February 1st
17 through March 5th?
18 A. Well, I don't know what happened to it,
19 but I'm -- from, looks like February 17th, I'm going
20 to school to get a type rating on the Boeing. And
21 I'm gone for about three weeks.
22 Q. So this is when you're doing a simulator
23 on the Boeing?
24 A. Correct.
25 Q. And getting your certification to fly the

1 DAVID RODGERS
2 Boeing?
3 A. Yes.
4 Q. The Boeing, was that previously owned by
5 The Limited or Les Wexner?
6 A. I'm not sure of the company name,
7 officially. But probably, yes.
8 Q. Some association with him?
9 A. Some association, yes.
10 Q. Do you know who flew the Gulfstream while
11 you were doing the simulator?
12 A. Well, it would have been Larry Visoski,
13 I'm not sure who the first officer was.
14 Q. Do you know if any logs were kept of the
15 passengers' names?
16 A. While I was at school?
17 Q. Right, while you were at school.
18 A. There probably were logs, but I don't know
19 where they are.
20 Q. Have you ever spoken with Larry about
21 whether he kept names of passengers?
22 A. I don't think he does.
23 Q. Do you know where Larry Visoski flew the
24 Gulfstream for the month that you were --
25 A. No.

1 DAVID RODGERS
2 Q. Sorry. Just let me finish my question. I
3 know I was getting it out slow.
4 -- but for the month that you were
5 training on the Boeing?
6 A. No.
7 Q. All right. So the last flight that you
8 took in the Gulfstream before you began, before you
9 flew the Cessna for a day, I guess, right, from
10 Santa Fe to DFW --
11 A. Right.
12 Q. -- February 3rd --
13 A. Yes.
14 Q. And that's the Cessna with 908GM tail
15 number?
16 A. Yes.
17 Q. The last flight that you flew on the
18 Gulfstream was the flight back from St. Thomas with
19 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, and
20 Virginia Roberts, right?
21 A. Uh-huh.
22 Q. And then the next time that you're on the
23 plane is -- on the Gulfstream is when?
24 A. It looks like March the 5th.
25 Q. And who are the passengers on that flight?

1 DAVID RODGERS
2 Where is it going to?
3 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
4 Tayler, Virginia Roberts.
5 Q. And then there's notation of Gary
6 Roxborough?
7 A. Yes.
8 Q. Do you know why that is?
9 A. Yeah. He was the first officer.
10 Q. Why did he become the first officer?
11 A. Because Larry was probably in training for
12 the Boeing.
13 Q. Okay. You took -- you alternated?
14 A. Right. We didn't go at the same time.
15 Q. All right. Then the Gulfstream has the
16 same aircraft make and model. That's the same
17 Gulfstream airplane, right?
18 A. Yes.
19 Q. But the aircraft identification mark
20 changes --
21 A. Correct.
22 Q. -- on March 5th, 2001.
23 A. Correct.
24 Q. And it changes to N -- it changes from
25 N908JE to N909JE.

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1 DAVID RODGERS
2 A. Yes.
3 Q. Why was that?
4 A. Because the N908JE went to the Boeing.
5 That was going to be on the Boeing now.
6 Q. And the new number for N909JE was
7 transferred to the Gulfstream?
8 A. Correct.
9 Q. And where does that first flight on the
10 5th go?
11 A. From Palm Beach to Stephenville up in
12 Newfoundland for a fuel stop.
13 Q. Okay. And then how do you know it is a
14 fuel stop?
15 A. Because we are going to Paris, and so we
16 have to stop there for fuel.
17 Q. Okay. I know how -- I know how you would
18 know that. But is there any indication on any of
19 the numbers that go off to the right that would tell
20 me that it's a fuel stop as opposed to --
21 A. No.
22 Q. No? Okay. All right. So there's no way
23 after today's deposition I can look at any of the
24 numbers; it's not going to tell me what it was for?
25 A. No. No. And it's -- obviously it looks

1 DAVID RODGERS
2 different, because one day is the 5th; one day is
3 the 6th. But we landed there like at 11:50 at
4 night. And then when we took off, it was, you know,
5 the next day.
6 Q. Okay. Got it.
7 And then where do you go the next day?
8 A. We went from Stephenville to
9 Paris-Le Bourget.
10 Q. And who were the passengers going to
11 Paris?
12 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
13 Tayler, and Virginia Roberts.
14 Q. And then what's the next flight?
15 A. On the 8th, from Paris to -- I believe
16 that is in Spain.
17 Q. Granada, Spain?
18 A. Granada, Spain. Correct.
19 Q. Okay. And who are the passengers on that
20 trip?
21 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
22 Tayler, Virginia Roberts, Alberto and Linda Pinto,
23 one female, and Ricardo, it looks like Orieta.
24 Q. And then what's the next flight?
25 A. From there to Tangiers. From Granada to

2 Tangiers.

3 Q. When you landed -- sorry to go back --

4 when you landed in -- what did we say LEGR was?

5 A. Granada, Spain.

6 Q. Where did -- where did you stay? Where do

7 you stay on those trips?

8 A. We didn't stay. We left the same day, I

9 believe.

10 Q. Okay. What if we go back to one flight to

11 LFPB?

12 A. Uh-huh. LFPB.

13 Q. That's Paris?

14 A. Yeah. We stayed in Paris.

15 Q. And do --

16 A. We stayed there.

17 Q. Do you know -- do you stay at the same

18 location where Jeffrey Epstein, Ghislaine Maxwell,

19 Emmy Tayler, and Virginia Roberts stay?

20 A. No.

21 Q. Where do you stay while you are in Paris?

22 A. Hotel.

23 Q. Where do they say?

24 MR. PAGLIUCA: Object to foundation.

25 THE WITNESS: He has a place there, in

2 Paris.

3 BY MR. EDWARDS:

4 Q. Okay. Jeffrey Epstein has a home or a

5 house in Paris?

6 A. Right.

7 Q. Okay. Have you been to it?

8 A. Yes, I believe I have.

9 Q. Have you ever stayed there?

10 A. No.

11 Q. And getting to and from the airport, were

12 you ever in the car riding to or from the airport in

13 Paris with Jeffrey Epstein?

14 A. No.

15 Q. So going down to the 9th, then, where is

16 that flight?

17 A. That is from Tangiers to London Luton

18 Airport.

19 Q. And is Luton Airport, is that a major

20 airport?

21 A. For general aviation it is. There is

22 airline service in there, but it is not a huge one,

23 for sure.

24 Q. Who were the passengers?

25 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy

1 DAVID RODGERS
2 Tayler, and Virginia Roberts.
3 Q. And am I reading this correctly that the
4 next flight is two days later, on the 11th?
5 A. Yes.
6 Q. And where does the flight on the 11th go?
7 A. From Luton to Bangor, Maine.
8 Q. All right. While in London, do you know
9 what Jeffrey Epstein, Ghislaine Maxwell, Emmy
10 Tayler, and Virginia Roberts did?
11 A. No, I do not.
12 Q. Do you know who they saw?
13 A. No, I do not.
14 Q. After the flight to Maine, where is the
15 next flight?
16 A. Maine is from Bangor to Teterboro the same
17 day.
18 Q. Okay.
19 A. So that was a fuel stop.
20 MR. EDWARDS: All right. We are at a good
21 time to stop. The videographer has to change
22 tapes.
23 THE WITNESS: Okay.
24 MR. EDWARDS: So we why don't we take a
25 five-minute break.

1 DAVID RODGERS
2 THE WITNESS: Okay.
3 THE VIDEOGRAPHER: Off the record at
4 10:57.
5 (Thereupon, a recess was taken, after
6 which the following proceedings were held:)
7 THE VIDEOGRAPHER: This is the beginning
8 of Disk 2. On the record at 11:12.
9 BY MR. EDWARDS:
10 Q. Sure. If we go back to page 41,
11 December 7th, 2000.
12 MR. PAGLIUCA: Give us a Bates page,
13 please.
14 MR. EDWARDS: Right, 41. For the
15 remainder, when I say "page," I'm really just
16 referring to the Bates number.
17 BY MR. EDWARDS:
18 Q. So page 41, December 7th, 2000.
19 A. Okay.
20 Q. Do you see that?
21 Where was that flight going from and to?
22 A. Luton to -- Luton -- that's going into
23 Marham Air Force Base.
24 Q. Do you remember why you would have flown
25 into the Air Force base?

1 DAVID RODGERS
2 A. We flew in there to drop the passengers
3 off. And then these passengers that were on there,
4 we dropped them off. And then -- let's see. We
5 repositioned.
6 I don't remember. We dropped passengers
7 off, and we had to leave, I believe.
8 Q. Okay. That was --
9 A. We weren't allowed to stay there.
10 Q. That was Tom Pritzker?
11 A. Yes.
12 Q. And then did you also drop off Jeffrey
13 Epstein, Ghislaine Maxwell, Kelly Spamm?
14 A. Yes.
15 Q. Okay.
16 A. I believe everyone got off the airplane
17 there.
18 Q. And where did you reposition to?
19 A. It says, "Positioned in Norwich, England."
20 I guess it's Norwich.
21 Q. Sandringham, that is what it says right
22 above that. What is that?
23 A. Sandringham. I believe Sandringham is the
24 estate that the queen has --
25 Q. Okay.

1 DAVID RODGERS
2 A. -- near there.
3 Q. All right. And the flight on
4 December 9th --
5 A. Uh-huh.
6 Q. That's Jeffrey Epstein, Ghislaine Maxwell,
7 Emmy Tayler, Kelly Spamm?
8 A. Right.
9 Q. And then what did you write in the
10 parenthesis under that?
11 A. "Blowing snow on runway." It was a great
12 weird phenomenon that happened that night.
13 Q. And then you're leaving out of that
14 Sandringham Airport; is that right?
15 A. We are -- which one are you on?
16 Q. On the 9th.
17 A. On the 9th --
18 Q. The first entry on the 9th.
19 A. The 9th, we're leaving, looks like
20 Norwich, England, I believe, EGSH, and we go to
21 Gander, Newfoundland --
22 Q. Okay?
23 A. -- for a fuel stop.
24 Q. I think before we took a break that we
25 were on page 43.

1 DAVID RODGERS
2 A. Uh-huh.
3 Q. And the flight that began in Palm Beach,
4 before going to Paris and Belgium, Tangier, I think
5 you told me, it ended up in Maine --
6 A. Correct.
7 Q. -- on March 11th, 2001.
8 A. Right.
9 Q. Or, sorry, it ended up in Teterboro.
10 A. Teterboro.
11 Q. Okay. And then on the 15th, you fly
12 from -- on the Gulfstream out of Teterboro to ISP.
13 Do you know where that is?
14 A. Islip, New York.
15 Q. Okay. And Virginia Roberts was on the
16 flight that landed in Teterboro on the 11th,
17 correct?
18 MR. PAGLIUCA: Object to form and
19 foundation.
20 THE WITNESS: Yes.
21 BY MR. EDWARDS:
22 Q. But leaving out of Teterboro, she's not
23 one of the passengers on the flight.
24 A. No.
25 Q. Any idea where she went?

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1 DAVID RODGERS
2 A. No.
3 Q. Okay.
4 MR. PAGLIUCA: Are you referring to
5 Bates 0041, the 11th through 14th? Is that
6 what you're talking about?
7 MR. EDWARDS: Forty-three.
8 MR. PAGLIUCA: Forty-three.
9 MR. EDWARDS: March 11th and March 15th,
10 2001.
11 MR. REINHART: If it will help there, the
12 flight numbers column, like the fifth or sixth
13 column over, are sequentially numbered and
14 unique numbers. So if you want to just say
15 "flight 1468" --
16 MR. EDWARDS: Okay.
17 MR. REINHART: -- that might help
18 everybody --
19 MR. EDWARDS: Right.
20 MR. REINHART: -- follow along.
21 MR. EDWARDS: Okay. Thanks, Bruce.
22 MR. REINHART: Uh-huh.
23 BY MR. EDWARDS:
24 Q. So the flight now that I'm talking about
25 that leaves out of Teterboro on the 15th, flight

1 DAVID RODGERS
2 No. 1471 --
3 A. Right.
4 Q. -- the passengers appear to be Jeffrey
5 Epstein, Ghislaine Maxwell, Adam Perry Lang, Alexia
6 Wallert and Banu Cukuglu?
7 A. I think so.
8 Q. Do you remember Banu?
9 A. I definitely remember that. It was a hard
10 name to spell.
11 Yeah. Sort of, I guess. I mean, if she
12 walked in right now, I probably wouldn't recognize
13 her.
14 Q. Well, it has been since 2001, so --
15 A. Yeah, I know.
16 Q. Okay. So then the next flight is 1472.
17 Where is that? Where is that going?
18 A. From Islip to Lake City, Florida.
19 Q. All right. And the passengers, again, are
20 who?
21 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
22 Perry Lang, Alexia Wallert and Banu Cukuglu,
23 whatever her name is.
24 Q. Did you know what relationship she had, if
25 at all, with Jeffrey Epstein?

1 DAVID RODGERS
2 A. No. No.
3 Q. Do you remember an Ed Tuttle?
4 A. Yes.
5 Q. And who was he?
6 A. I believe Ed was a, probably in
7 construction. I think he may have been around
8 before the Jeffrey -- well, let me think.
9 Q. If we skip down to March 16th, I see his
10 name. So I don't know if that's going to help you.
11 A. I believe -- I believe Ed Tuttle was like
12 maybe an architect, or somewhere in the
13 construction, real estate side, I believe.
14 Q. Okay. So flight No. 1477 --
15 A. Uh-huh.
16 Q. -- from LaGuardia to Palm Beach, is that
17 Jeffrey Epstein, Ghislaine Maxwell, Emmy Tayler, Joe
18 Pagano, Eva Dubin?
19 A. Yes.
20 Q. Celina Dubin?
21 A. Yes.
22 Q. Jordan Dubin?
23 A. Right.
24 Q. Maya Dubin and two nannies?
25 A. Yes.

1 DAVID RODGERS
2 Q. And Alexia Wallert? Is that what that is?
3 A. I would assume so, yes, AW.
4 Q. That is sort of what we talked about in
5 the beginning, where Alexia Wallert appears in full
6 name at the top --
7 A. Right.
8 Q. -- and it's AW, AW, AW.
9 A. And there's no room to write her name out
10 there --
11 Q. Right.
12 A. -- so she's AW.
13 Q. Okay. And then the next flight, the 27th,
14 leaves out of Palm Beach. Who are our passengers on
15 that flight and where's it going? 1478 is the
16 flight.
17 A. Yeah. Jeffrey Epstein, Ghislaine Maxwell,
18 Emmy Tayler, Virginia Roberts, two females, Banu,
19 and that's it.
20 Q. And do you know, in New York, when that
21 plane lands in Teterboro, where do you stay when the
22 plane is up there?
23 A. It is 2001. At an apartment there.
24 Q. Did you have your own apartment?
25 A. Yes.

1 DAVID RODGERS
2 Q. Or did you stay at one of Jeffrey
3 Epstein's apartments?
4 A. No. It was his apartment, Jeffrey's
5 apartment.
6 Q. Was that one of the apartments at 301 East
7 66th Street?
8 A. Yes.
9 Q. And did any of the other passengers from
10 that flight, that 1478, did any of them stay at any
11 of those apartments?
12 A. Yeah. Emmy would have. Virginia probably
13 did.
14 Q. Did you see Virginia stay at the
15 apartment?
16 A. I don't know.
17 Q. When you were in New York and you left
18 from the airport, did you ride in the same car with
19 Virginia?
20 A. Not usually. I mean, I don't know if we
21 ever did. It's possible we did.
22 Q. Do you know whether Virginia Roberts
23 stayed at Jeffrey Epstein's townhouse or whether
24 Virginia Roberts stayed at the apartments?
25 MR. PAGLIUCA: Object to form.

1 DAVID RODGERS
2 THE WITNESS: I don't know for sure.
3
4 BY MR. EDWARDS
5 Q. Can you recollect riding in a car with
6 her, or can you recollect whether she got in a car
7 with anyone else?
8 MR. PAGLIUCA: Object to form.
9 THE WITNESS: I can't.
10 MR. EDWARDS: Okay.
11 MR. REINHART: I'm sorry. Are you asking
12 about that specific trip or --
13 MR. EDWARDS: Sorry.
14 BY MR. EDWARDS:
15 Q. I mean that specific trip.
16 A. No. I can't.
17 Q. How about in general at any time?
18 A. No. I don't recall. I mean, I can
19 recall, I would ride sometimes with Emmy, with Adam
20 I remember them being in the car. But, again, that
21 was unusual. Usually it would just be Larry and
22 myself. But on occasion, you know, somebody might
23 ride with us.
24 Q. When you would stay at the apartment in
25 New York on East 66th Street, would it always be in

1 DAVID RODGERS
2 the same apartment?
3 A. Yes.
4 Q. All right. There are multiple apartments
5 owned by Jeffrey Epstein?
6 A. At that time, it was the same apartment.
7 Q. Okay. Have you stayed in other apartments
8 since that time?
9 A. Yes.
10 Q. All at that East 66th Street location?
11 A. Yes. I really don't -- I don't have an
12 apartment there now. We haven't gone there since
13 probably 2008.
14 Q. How about Banu? Would she have stayed at
15 301 East 66th Street?
16 MR. PAGLIUCA: Object to foundation.
17 THE WITNESS: Most likely.
18 BY MR. EDWARDS
19 Q. Why do you say that?
20 A. Well, if she's on the plane with us on
21 multiple trips, then most likely she probably stayed
22 there.
23 Q. Have you been to Jeffrey Epstein's
24 townhouse as 9 East 71st Street?
25 A. Yes.

1 DAVID RODGERS
2 Q. And it's a pretty big place, right?
3 A. Pretty big.
4 Q. And it has numerous bedrooms?
5 A. Yes.
6 Q. Any reason why Banu would not have been
7 staying there?
8 MR. PAGLIUCA: Object to foundation.
9 THE WITNESS: I don't know.
10 BY MR. EDWARDS
11 Q. I'm just trying to get to, is there a
12 reason why you believe that Banu would have, I think
13 you said, probably have stayed at the apartment
14 versus the townhouse?
15 A. Well, I only say that because Emmy, you
16 know, stayed there.
17 Q. Stayed where?
18 A. At the -- at our apartments.
19 Q. Okay.
20 A. I'm pretty sure Adam, yeah, Adam stayed
21 there at the time. So most of the people that were
22 regulars on the flight, they would stay there in the
23 apartments.
24 Q. Okay. But do you remember Virginia or
25 Banu staying in the apartments?

1 DAVID RODGERS
2 A. I do not specifically.
3 Q. Okay. The next flight on the next day,
4 1479, is flying from Teterboro to Santa Fe; is that
5 right?
6 A. Yes.
7 Q. And who are those passengers?
8 A. Jeffrey Epstein, Ghislaine Maxwell, Adam
9 Perry Lang, Virginia Roberts, Banu, Marvin Minsky,
10 Henry Jarecki.
11 Q. Do you remember Marvin and Henry?
12 A. I remember Henry. I don't really remember
13 Marvin.
14 Q. Okay. And then two days later -- again,
15 where would you have stayed if you landed in
16 Santa Fe on March 29th, 2001?
17 A. Probably would have stayed at the ranch.
18 Q. At the Zorro Ranch?
19 A. Yes.
20 Q. All right. Did the other passengers that
21 were on the plane, Jeffrey Epstein, Ghislaine
22 Maxwell, Adam Perry Lang, Virginia Roberts, Banu --
23 I'm not evening going to try her last name --
24 A. Right.
25 Q. -- Marvin Minsky and Henry Jarecki also

1 DAVID RODGERS
2 have stayed at the ranch?
3 MR. PAGLIUCA: Object to foundation.
4 THE WITNESS: I'm going to say most likely
5 they did.
6 BY MR. EDWARDS
7 Q. Was there any other location in Santa Fe
8 where you are aware passengers would have stayed?
9 A. Not that I'm aware of.
10 Q. If you were all going to the same place,
11 is that an occasion where you would all ride in the
12 same vehicle from the airport to the ranch?
13 MR. PAGLIUCA: Object to foundation.
14 THE WITNESS: I don't know.
15 BY MR. EDWARDS
16 Q. You would still right in separate
17 vehicles?
18 A. Right. Because it takes us about an hour
19 to finish up at the airport.
20 Q. And then the 31st, so two days?
21 A. Let me go back to that one --
22 Q. Sure.
23 A. -- and say, it is possible. I think Adam
24 has ridden with us before. So I couldn't swear that
25 one way or the other. But he has probably ridden

1 DAVID RODGERS
2 with us before to the airport; to or from the
3 airport.
4 Q. Two days later, flight No. 1408 out of
5 Santa Fe to Palm Beach, who were the passengers
6 there?
7 A. Jeffrey Epstein, Ghislaine Maxwell, Prince
8 Andrew, Virginia Roberts, Nadia Bjorlin, Henry
9 Jarecki, Marvin Minsky.
10 Q. Do you remember when you were at the ranch
11 Nadia Bjorlin arriving?
12 A. I would assume that she airlined in there.
13 Q. Do you remember her at the ranch? Did she
14 perform for you or anything?
15 A. No.
16 I don't remember her at the ranch. I
17 mean, I'm sure she was there. I just don't
18 remember.
19 Q. Okay. Do you remember a person named
20 Heather Mann? She's found on flight 1438 next to
21 Lydia.
22 A. Heather Mann, not really.
23 Q. Okay. The next flight, on page 45, is
24 1488. The flight number. April 9th, 2001.
25 A. Right.

1 DAVID RODGERS
2 Q. Where does that flight take off from and
3 where does it go?
4 A. Palm Beach to Atlantic City.
5 Q. Who is on that flight?
6 A. Jeffrey Epstein, Emmy Tayler, Virginia
7 Roberts, Banu and Johanna.
8 Q. Do you remember Johanna Sjoberg?
9 A. I don't.
10 Q. On that same day, you take a flight to
11 Teterboro?
12 A. Right.
13 Q. Did you go to the casinos at all that day?
14 A. I don't think so.
15 Q. Would that be something that you would do
16 with them? Or you would stay back?
17 A. No. We would stay at the airport.
18 Q. All right.
19 And then two days later, on the 11th,
20 flight 1490, the plane flies out of Teterboro.
21 For that two-day period of time, the night
22 of the 9th and the night of the 10th, would you have
23 stayed at the apartment?
24 MR. PAGLIUCA: Object to foundation.
25 MR. EDWARDS: In New York.

1 DAVID RODGERS
2 THE WITNESS: I would say, yes.
3 BY MR. EDWARDS:
4 Q. All right. Do you know where Virginia and
5 Banu and Johanna stayed?
6 A. No idea.
7 Q. You can't recollect whether they were --
8 you can't recollect seeing them at the apartments?
9 MR. PAGLIUCA: Object to foundation.
10 THE WITNESS: No.
11 BY MR. EDWARDS:
12 Q. All right.
13 Then on the 11th, you leave from Teterboro
14 and go to where?
15 A. St. Thomas.
16 Q. That is flight 1490. And on that flight,
17 Jeffrey Epstein, Ghislaine Maxwell, Prince Andrew,
18 Banu, Virginia Roberts and Johanna?
19 A. Yes.
20 Q. And that is -- that is a flight -- how
21 does -- how did those passengers get from -- does
22 Jeffrey Epstein have a place in St. Thomas?
23 MR. PAGLIUCA: Object to form.
24 THE WITNESS: Well, yes.
25

1 DAVID RODGERS
2 BY MR. EDWARDS:
3 Q. Where is that?
4 A. In St. Thomas, he has an office. In St.
5 Thomas.
6 Q. Where does he stay in the Virgin Islands?
7 A. On Little St. James.
8 Q. And how do the passengers get from
9 St. Thomas to Little St. James?
10 A. Most likely, helicopter.
11 Q. How many people does the helicopter fit?
12 A. We didn't own a helicopter then.
13 Probably -- probably 5. It depends,
14 because they had different helicopters. I'm not
15 sure which one they used that day.
16 Q. What is the duration of the flight from
17 St. Thomas to Little St. James?
18 A. About six minutes.
19 Q. What is the duration of a boat trip from
20 Little St. James to St. Thomas?
21 A. Probably about, let's say, 15 to 20
22 minutes. But you are on the east side of the island
23 and the airport is almost to the west side of the
24 island.
25 Q. So you have to almost circle the island?

1 DAVID RODGERS
2 A. To get from the island by boat, to get
3 to -- there's land there and take a car, it is
4 probably -- it is probably close to an hour, 45
5 minutes for sure.
6 Q. Are there passenger manifests that are
7 kept for the helicopters?
8 MR. PAGLIUCA: Object to foundation.
9 THE WITNESS: I'm not sure. I'm not sure.
10 BY MR. EDWARDS:
11 Q. Back in this time, in around April of
12 2001, did Jeffrey Epstein have a helicopter yet?
13 A. No, he did not have a helicopter.
14 Q. At that time?
15 A. Correct.
16 Q. And so do you remember the name of the
17 company or corporation that they rented or
18 transported?
19 A. I don't. It was the only -- helicopter
20 service there in St. Thomas is no longer there.
21 Q. Okay.
22 A. Air Center Helicopter.
23 Q. Was there a particular person at Air
24 Center Helicopter that you ever coordinated with?
25 A. We would, like, call a dispatcher. Or you

1 DAVID RODGERS
2 know, whoever picked up the phone, we would call
3 them.
4 Q. All right. So 1491 is a flight from
5 St. Thomas to Palm Beach; is that right?
6 A. Yes.
7 Q. And Gwendolyn Beck is now on that flight?
8 A. Yes.
9 Q. Do you remember that flight at all, 1491?
10 A. Not really.
11 Q. Anything about it stick out in your mind?
12 A. No.
13 Q. All right. The next flight that -- do you
14 remember a female name Kelly Bovina?
15 A. I remember the name, but I don't remember
16 her.
17 Q. Was she an actress as well, do you
18 remember that?
19 A. I don't recall.
20 Q. The next flight I want to direct your
21 attention is 1501, May 3rd, 2001.
22 A. Okay.
23 Q. What is that airport, ADS?
24 A. Addison, Texas. San Antonio, Texas.
25 Q. And who are the passengers on that?

1 DAVID RODGERS
2 A. Jeffrey Epstein, Virginia Roberts.
3 Q. Do you know how Virginia Roberts got to
4 Addison, Texas?
5 A. No.
6 Q. Was that flight -- was the purpose of that
7 flight only to pick up Virginia Roberts?
8 MR. PAGLIUCA: Object to form and
9 foundation.
10 BY MR. EDWARDS:
11 Q. Can you tell by your logs?
12 A. Not really. Let's see. We -- no, I don't
13 know.
14 Q. The flight previous on the 3rd flies in
15 from where? Where is that?
16 A. Little Rock.
17 Q. Arkansas?
18 A. Correct.
19 Q. So the only passenger on that flight from
20 Little Rock, Arkansas, to Addison, Texas, flight
21 1500, is Jeffrey Epstein, right?
22 A. Right.
23 Q. And then you land in Addison before going
24 to Santa Fe?
25 A. That is actually San Antonio, I believe.

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1 DAVID RODGERS
2 Yes. That is San Antonio, SAT.
3 Q. How long is the flight from Addison to San
4 Antonio?
5 A. I would be guessing, probably an hour.
6 Q. Do you know what the purpose was for
7 landing --
8 A. Well, you know, I can tell you. It is
9 9/10s. Fifty-four minutes.
10 Q. Do you know what the purpose was to be to
11 land in Addison, Texas, before arriving in San
12 Antonio?
13 A. I do not. But it appears that we spent
14 the night in San -- oh, I see what you are saying.
15 No, I don't know. That I went to Addison probably
16 the same day.
17 Q. Went to Addison and picked up Virginia
18 Roberts?
19 A. It looks like it.
20 Q. And then in San Antonio, two days later,
21 who are your passengers on that flight, 1502?
22 A. Jeffrey Epstein, Virginia Roberts.
23 Q. Where do you fly?
24 A. From San Antonio to Palm Beach.
25 Q. And in May, on May 14th, 2001, flight

Confidential

1 DAVID RODGERS
2 1506, where is that flight leaving from?
3 A. St. Thomas.
4 Q. And going where?
5 A. Teterboro.
6 Q. And who are your passengers?
7 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
8 Tayler, Banu, Virginia Roberts and one female.
9 Q. And, again, do you remember who the one
10 female would have been with Virginia Roberts?
11 A. No.
12 Q. Can you tell by this how any of those
13 individuals that were on that flight leaving from
14 the Virgin Islands to Teterboro got to the Virgin
15 Islands?
16 A. No.
17 Q. What were the other possible avenues back
18 in those days for Jeffrey Epstein, Ghislaine Maxwell
19 to travel to the Virgin Islands?
20 A. They could have done a charter, possibly.
21 Q. Okay. Was there ever a time when, it
22 looks like that is the -- that is the Gulfstream
23 that you fly out of the Virgin Islands to Teterboro,
24 correct?
25 A. Correct.

1 DAVID RODGERS
2 Q. Was there ever a time you were flying the
3 Gulfstream and -- well, let's go back a little bit.
4 A. Okay.
5 Q. On May 7th, at the top.
6 A. Right.
7 Q. Flight 1503, that is the Gulfstream
8 traveling from Palm Beach to CHO?
9 A. That is Charlottesville, I believe,
10 Virginia.
11 Q. And then on that same day from
12 Charlottesville to Teterboro?
13 A. Correct.
14 Q. So when does the Gulfstream get from
15 Teterboro to St. Thomas?
16 A. Hmm, I don't know. Because it appears
17 that I'm on vacation at that time. So I don't know.
18 Q. How did you get to St. Thomas for the 14th
19 to fly?
20 A. Airline.
21 Q. All right. So at some point in time,
22 between May 7th and May 14th --
23 A. Uh-huh.
24 Q. -- somebody flies the Gulfstream to the
25 Virgin Islands.

1 DAVID RODGERS
2 A. Correct.
3 Q. And who would that be?
4 MR. PAGLIUCA: Object to foundation.
5 THE WITNESS: Larry Visoski and I don't
6 know who the other person would have been.
7 BY MR. EDWARDS:
8 Q. When you pick up passengers in the Virgin
9 Islands and you are taking them to Teterboro, do you
10 speak with Larry Visoski about when he arrived in
11 the Virgin Islands?
12 A. Yeah. Yeah. We would coordinate that. I
13 mean, usually we would go down there together. We
14 would ride in the same airline down.
15 Q. In this particular case, you were on
16 vacation?
17 A. Well, that is true. However, most likely
18 he airlined home once he got to St. Thomas. And
19 then most likely, we drove in a car to Miami and
20 road the same airline down there.
21 Q. That was something that you customarily
22 did?
23 A. Yes.
24 Q. Okay. So then you have -- we have no way
25 of knowing then who the passengers that flew to the

1 DAVID RODGERS
2 Virgin Islands would have been, if there were any in
3 addition to those that left?
4 A. No.
5 Q. All right. You fly into Teterboro on
6 flight 1506 on May 14th, 2001, and fly out in the
7 Gulfstream on the 24th, 10 days later; is that
8 right?
9 A. Yes.
10 Q. And your passengers, 10 days later flying
11 to Palm Beach are Jeffrey Epstein, Ghislaine
12 Maxwell, Emmy Tayler, Adam Perry Lang and a female.
13 A. Right.
14 Q. Do you know where Virginia Roberts went
15 during that time after she landed in Teterboro on
16 the 14th?
17 A. I do not.
18 Q. Page 47, I'm going to go to flight
19 No. 1510. June 3rd, 2001.
20 Who is on that flight?
21 A. Jeffrey Epstein, Virginia Roberts, Banu.
22 Q. And you are flying from Palm Beach to
23 St. Thomas again?
24 A. St. Thomas, yes.
25 Q. And then from St. Thomas to Teterboro two

1 DAVID RODGERS
2 days later, on June 5th?
3 A. Jeffrey Epstein, Virginia Roberts, and
4 Banu.
5 Q. All right. And then where is the next
6 flight on the 8th?
7 A. On the 8th, from Teterboro to Montreal.
8 Q. Do you know what -- so Virginia Roberts
9 and Banu were not on the flight on the 8th, right?
10 A. That's correct.
11 Q. Okay. Do you remember the flight on the
12 8th with Naomi Campbell, Rebecca White, Ana Malova?
13 A. Sort of. But not really.
14 Q. Okay. Do you remember who Rebecca White
15 is?
16 A. No.
17 Q. Do you remember how old Rebecca White was?
18 A. No.
19 Q. The next flight I want to direct your
20 attention to is on the 15th of June, flight 1516.
21 A. Uh-huh.
22 Q. Passengers: Jeffrey Epstein, Ghislaine
23 Maxwell, and then does that say Sheridan?
24 A. Yes.
25 Q. Do you remember a passenger named Sheridan

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1 DAVID RODGERS
2 Gibson?
3 A. Possibly.
4 Q. And then it says, Caroline. Do you know
5 who Caroline is?
6 A. I do not.
7 Q. And then one female?
8 A. Yeah, I don't know who the female is.
9 Q. Okay. On the 28th, there is a flight
10 1523.
11 A. Uh-huh.
12 Q. From -- is that Portugal to St. Thomas?
13 A. No. It is the Azores.
14 Q. LPAZ?
15 A. Yes. It was a fuel stop.
16 Q. To St. Thomas?
17 A. Right.
18 Q. And then on that flight is Jeffrey
19 Epstein, Ghislaine Maxwell, Emmy Tayler and Ed
20 Tuttle, right?
21 A. Yes.
22 Q. Six days later, leaving on July 4th from
23 St. Thomas, who are your passengers?
24 A. Jeffrey Epstein, Prince Andrew, Virginia
25 Roberts, one female.

1 DAVID RODGERS
2 Q. And do you know how Virginia Roberts got
3 to the Virgin Islands?
4 A. No.
5 Q. Is there any -- is it possible that the
6 Cessna took her or the Boeing took her? Or any
7 other aircraft that is owned by Jeffrey?
8 MR. PAGLIUCA: Object to foundation.
9 THE WITNESS: No, I would -- if I had to
10 guess, I would guess the airlines.
11 BY MR. EDWARDS:
12 Q. Okay.
13 A. Well, I know it wasn't the Boeing, because
14 the Boeing is not in operation at that point in
15 time. We hadn't flown it. I mean, it hadn't had
16 any passengers on board yet. That is like in August
17 of 2001.
18 Q. Okay. And the Cessna, did you take that
19 from Florida to the Virgin Islands?
20 A. It has been to the Virgin Islands, but I
21 don't think we ever took any passengers down there.
22 Q. Okay. All right. The next flight is
23 1525.
24 A. Okay.
25 Q. On July 8th, 2001.

1 DAVID RODGERS
2 A. Okay.
3 Q. That leaves out of Palm Beach?
4 A. Okay.
5 Q. Where do you go on that?
6 A. Teterboro.
7 Q. And who are your passengers?
8 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
9 Tayler, Prince Andrew, Virginia Roberts, Sheridan
10 Gibson, maybe Sheridan Gibson-Beaute, I guess, and
11 one female.
12 Q. And then three days later, you leave out
13 of Teterboro to CPS?
14 A. Yes.
15 Q. Where is that?
16 A. That is St. Louis, actually it is Cahokia,
17 Illinois, across the river from St. Louis.
18 Q. Who are your passengers?
19 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
20 Tayler, Virginia Roberts. We were actually en route
21 to Santa Fe. We had a mechanical problem. We had
22 to go into there for maintenance.
23 Q. Do you remember having a mechanical
24 problem or is the log just refreshing your memory?
25 A. No, I remember because that was the only

1 DAVID RODGERS
2 time we landed at Cahokia with passengers on board.
3 Q. What was the problem?
4 A. We had a -- we had a static line that had
5 cracked and it was causing our altimeters to not
6 agree. And then we went to the alternate system,
7 things got really worse because it was stopped up
8 with a mud dauber somewhere in the system. That is
9 why I remember that flight.
10 Q. When you landed in St. Louis did the
11 passengers get off the plane?
12 A. Yes. And then they airlined -- I believe
13 they airlined. They could have taken a charter, I
14 don't recall. But I know they didn't leave with us.
15 Q. All right. And the passengers that got
16 off the plane would have been Jeffrey Epstein,
17 Ghislaine Maxwell, Emmy Tayler and Virginia Roberts?
18 A. Yes.
19 Q. And then on the 16th, those five days
20 later, those same passengers leave Santa Fe?
21 A. Right.
22 Q. And go back to Teterboro?
23 A. Correct.
24 Q. When Jeffrey Epstein would go to his
25 townhouse in New York, would you always fly into

1 DAVID RODGERS
2 Teterboro?
3 A. Most of the time. It would depend on the
4 airplane, too. Like the Boeing, you are not allowed
5 to take it into Teterboro.
6 Q. So while you had the Gulfstream, it seemed
7 like Teterboro?
8 A. Yeah, it is -- I mean, occasionally there
9 would be a LaGuardia in there, but not really often.
10 Q. So on the 16th, you fly in to Teterboro.
11 And then six days later, it looks like, flight
12 No. 15 -- oh, wait. All right.
13 So flight No. 1528, you fly into
14 Teterboro, Jeffrey Epstein, Emmy Tayler, Ghislaine
15 Maxwell and Virginia Roberts. Do you see that?
16 A. Yes.
17 Q. Then the next flight I have listed is
18 1530.
19 Do you know where 1529 is?
20 A. No, other than I'm gone for some reason.
21 I wasn't on that flight.
22 Let's see. July, approximately. I see I
23 went on vacation.
24 Q. Okay. And the 23rd, there is a flight
25 from Palm Beach to St. Thomas with Jeffrey Epstein,

1 DAVID RODGERS
2 Shelly Lewis. Do you see that?
3 A. Yes.
4 Q. Five days later, the flight that leaves
5 St. Thomas does not have Shelly Lewis; is that
6 right?
7 A. Correct.
8 Q. And then you fly to Palm Beach?
9 A. Yes.
10 Q. And who are your passengers at that time?
11 A. Jeffrey Epstein, Virginia Roberts, yes.
12 Q. When you had the mechanical problem, do
13 you remember any of the passengers being scared or
14 frightened?
15 A. No. Not really. I mean, they didn't
16 really know that we had a problem. We just informed
17 them that we couldn't continue on to Santa Fe.
18 Q. Okay. And August 7th, 2001, flight 2?
19 A. Uh-huh.
20 Q. Is that the first flight that the Boeing
21 makes with passengers?
22 A. Correct.
23 Q. And that is Jeffrey Epstein, Ghislaine
24 Maxwell, Emmy Tayler, Prince Andrew and two females.
25 Do you remember who the two females were on the

1 DAVID RODGERS
2 first passenger flight of the Boeing?
3 A. I do not.
4 Q. And then on the 7th -- at that flight flew
5 from Los Angeles to Albuquerque, correct?
6 A. Uh-huh.
7 Q. On the 14th, you were flying the Cessna
8 that has the 908GM tag.
9 A. Correct. Right.
10 Q. And then the next entry with passengers is
11 on the 16th. And you are flying the Boeing again,
12 right?
13 A. Yes.
14 Q. All right. Do you know who flew the
15 Boeing for flight 3, 4 and 5?
16 A. For 3, 4 and 5, no. Oh, yes. I know it
17 wasn't me. I do remember that now.
18 I went on vacation. And it was a contract
19 guy that flew for us while I was gone.
20 Q. Do you remember a passenger named
21 Alexander Dixon?
22 A. Alexander Dixon, no.
23 Q. Flight No. 11 on the Boeing?
24 A. Uh-huh.
25 Q. Now, the Boeing has the tag 908JE?

1 DAVID RODGERS
2 A. Correct.
3 Q. That is what you were explaining in the
4 beginning, correct?
5 A. Correct.
6 Q. So September 3rd, the Boeing flies from
7 St. Thomas to HPN?
8 A. Yes, White Plains, New York.
9 Q. And your passengers?
10 A. Jeffrey Epstein, Ghislaine Maxwell, Emmy
11 Tayler, Adam Perry Lane, Banu, Sarah Kellen,
12 Alexander Dixon.
13 Q. Do you remember Sarah Kellen?
14 A. Yes.
15 Q. And do you remember what -- is that your
16 first time meeting Sarah Kellen, when she appears?
17 A. I don't think so. I thought she was on an
18 earlier flight. Let's see. But it could be. It
19 could be, I'm not sure.
20 Q. Do you know how Sarah Kellen got to
21 St. Thomas to be leaving St. Thomas with you?
22 A. No.
23 Q. Do you know what her relationship was, if
24 any, with Jeffrey Epstein?
25 A. She was -- Sarah was sort of taking over

1 DAVID RODGERS
2 Emmy's position. Like an assistant to Ghislaine.
3 Q. All right. Page 53. January 15th, 2002.
4 A. Okay.
5 Q. There is a flight from Bedford,
6 Massachusetts; is that right?
7 A. Yes.
8 Q. To where is that going?
9 A. White Plains.
10 Q. And it's Jeffrey Epstein and Jessica.
11 A. Yes.
12 Q. Do you remember who Jessica is?
13 A. I do not.
14 Q. From White Plains, who are the passengers
15 going to St. Thomas?
16 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
17 Kellen, Prince Andrew, Cindy Lopez, Johanna and one
18 female.
19 Q. Do you remember Cindy Lopez?
20 A. Yes.
21 Q. And what did she do?
22 A. I don't know what she did, but I do
23 remember Cindy Lopez.
24 Q. Was she somebody that you believed to be a
25 masseuse?

1 DAVID RODGERS
2 A. I'm not sure what her position was. It is
3 possible.
4 Q. All right. February 9th, 2002, flight 57
5 on the Boeing.
6 A. Okay.
7 Q. From Miami to White Plains.
8 A. Yes.
9 Q. Your passengers include Bill Clinton, four
10 Secret Service.
11 Did the Secret Service ask that you not
12 identify them by name?
13 A. No.
14 Q. Any reason that you didn't identify them
15 by name?
16 A. Didn't know their name.
17 Q. Two males, one female.
18 A. Right.
19 Q. Jeffrey Epstein, Ghislaine Maxwell, Sarah
20 Kellen and Prince Andrew.
21 A. Correct.
22 Q. Was that your first time meeting Bill
23 Clinton?
24 A. Yes.
25 Q. At that point, did you have any

1 DAVID RODGERS
2 understanding of what was the relationship between
3 Jeffrey Epstein and Bill Clinton or Ghislaine
4 Maxwell and Bill Clinton?
5 A. No, I didn't have any idea.
6 Q. Had you seen any pictures, prior to that
7 time, of Bill Clinton in any of Jeffrey Epstein's
8 planes or homes?
9 A. Not him I'm aware of.
10 Q. Have you ever seen a picture of Bill
11 Clinton in Jeffrey Epstein's plane?
12 A. In his plane? I don't think so.
13 Q. Have you ever seen one in his homes?
14 A. Not that I can recall.
15 Q. Okay.
16 A. Oh, wait, wait. Back up. A picture of
17 Bill Clinton in the plane? Do you mean the picture
18 is on the wall in the airplane or a picture taken of
19 Bill Clinton on the plane?
20 Q. A picture of Bill Clinton on the wall of
21 the airplane.
22 A. I have a picture of me and actually the
23 crew with Bill Clinton on the plane, but it is not
24 on the wall of the airplane.
25 Q. And when was the picture of you with Bill

1 DAVID RODGERS
2 Clinton taken?
3 A. I think it was the first flight.
4 Q. The flight that we just looked at?
5 A. Yes.
6 Q. To the best of your knowledge, is that the
7 first time that Bill Clinton flew with Jeffrey
8 Epstein or Ghislaine Maxwell?
9 A. To the best of my knowledge. It was the
10 first time that we had flown him.
11 Q. Okay. On flight No. 72, which is page 54,
12 March 10th.
13 A. Okay.
14 Q. The Boeing flies from St. Thomas to JFK;
15 is that right?
16 A. Yes.
17 Q. Is there any way of knowing when the
18 Boeing got to St. Thomas by these logs?
19 A. Yes, it got there on the 28th. Because it
20 is trip No. 71 above it. Oh, wait. Oh. Wait.
21 State the question again.
22 Q. Yes, exactly.
23 Do we know how or when the Boeing got to
24 St. Thomas? It is leaving out of St. Thomas on
25 flight 72, but flight 71 seems to me to land in Palm

1 DAVID RODGERS
2 Beach.
3 A. Correct.
4 Q. So I'm just missing the kind of connection
5 there.
6 A. Yes. Me, too.
7 Q. Okay.
8 A. Yeah, I don't have an answer for that.
9 Q. Okay. Would somebody else have flown the
10 Boeing, while you were doing this simulator, the 6th
11 and 7th and 8th?
12 A. It is possible.
13 Q. That is one possible conclusion, based
14 upon what we have here?
15 A. That is probably what happened.
16 Q. Okay.
17 So then March 10th -- sorry. March 10th,
18 you fly to JFK, right?
19 A. Yes.
20 Q. March 4th, from JFK to Palm Beach. March
21 the 17th, from Palm Beach back to JFK. And then
22 March 19th, 2002, you fly from JFK to -- where is
23 that?
24 A. Luton, London.
25 Q. And who are your passengers?

1 DAVID RODGERS
2 A. Bill Clinton. Doug Band. Three Secret
3 Service, Jeffrey Epstein, Ghislaine Maxwell, Sarah
4 Kellen.
5 Q. And the next day -- or, sorry, two days
6 later.
7 Do you know where those passengers stayed
8 in London?
9 A. I have to think about this one second.
10 No, in fact, I don't think they did. Because we
11 didn't spend the night there. We went there. I got
12 to the hotel. As soon as I got to the hotel, I got
13 word from Secret Service that President Clinton
14 wanted to leave that night, so we left that night.
15 So we made it to the hotel, the crew did,
16 but we were there not that long. Two or three
17 hours, four hours, maybe.
18 Q. Do you remember why he wanted to leave
19 that night?
20 A. No. No, because when we went there, we
21 thought we were going to be there for like probably
22 at least a couple of nights. But it didn't turn
23 out -- we didn't even spend one night there.
24 Q. Okay. So does this probably mean that you
25 got there late at night on the 19th, the early

1 DAVID RODGERS
2 morning on the 21st?
3 A. We took off the 19th. So when we land
4 there, it is really the 20th. And probably when we
5 took off there, it is like after midnight or
6 thereabouts.
7 Q. And that is when you fly back to JFK?
8 A. Back to JFK, yes.
9 Q. And you went there with three Secret
10 Service and came back with 10?
11 A. Yes.
12 Q. How did that happen?
13 A. Well, there was an advance party waiting
14 for us when we got there and then when we came back,
15 they just flew back with us.
16 Q. What was the events that you were
17 traveling to London for?
18 A. I'm not sure. I would imagine, he was
19 probably giving a speech.
20 Q. Okay. And you came back with Bill
21 Clinton, Doug Band?
22 A. Yes.
23 Q. Who was Doug Band?
24 A. Doug was Bill Clinton's, he's an attorney,
25 and he was like his right-hand guy, really, as far

1 DAVID RODGERS
2 as doing anything.
3 Q. Okay. And you also flew back with Jeffrey
4 Epstein, Ghislaine Maxwell, Sarah Kellen and Naomi
5 Campbell?
6 A. Yes.
7 Q. How did it happen that Naomi Campbell
8 joined the plane to come home?
9 A. I don't know. The same way she joined it
10 before I guess in Montreal. I don't know how she
11 was there. And one male, too. It looks like.
12 Q. All right. The next page is page 56,
13 flight 96.
14 A. Okay.
15 Q. Sorry. Let's back up to 94.
16 When the Boeing takes off from JFK, do you
17 know sometime during that trip that you are going to
18 be picking up President Clinton?
19 A. I think so. Let me see. We went to
20 Paris.
21 Yes, oh, yes. We knew that was going to
22 be a long trip.
23 Q. Okay.
24 A. So we knew at that point in time. I'm
25 almost certain that we knew.

1 DAVID RODGERS
2 Q. What did you know about that trip?
3 A. We knew that was going to be a long trip
4 because we were going to go around the world.
5 So when we departed, it was a about a week
6 later, as I recall, that we picked up Clinton. We
7 left JFK on the 11th, a little less than a week.
8 Half a week later, we picked up Clinton and from
9 there, we went to -- Hong Kong.
10 Q. So you fly in to -- on the 20th, flight
11 99, Jeffrey Epstein, Ghislaine Maxwell, and Sarah
12 Kellen.
13 A. Right.
14 Q. You fly in to a Naval air base in Japan?
15 A. Correct.
16 Q. How were you given access to stay in the
17 Naval air base?
18 MR. PAGLIUCA: Object to foundation.
19 THE WITNESS: The airplane, you mean?
20 BY MR. EDWARDS:
21 Q. Yes. It looks like it is there two days.
22 That is why --
23 A. I guess because we were picking up
24 President Clinton.
25 Q. And do you know where Jeffrey Epstein,

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1 DAVID RODGERS
2 Ghislaine Maxwell and Sarah Kellen stayed?
3 A. I do not.
4 Q. Was there a room for them on the Naval air
5 base?
6 A. No, I don't think -- nobody stayed at the
7 Naval air base.
8 Q. All right. And then on the 22nd, you
9 leave the Naval air base with -- who is that on that
10 flight?
11 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
12 Kellen, President Bill Clinton, Mike, Doug Band,
13 Janis and Jessica.
14 Q. You flew into the Naval air base with
15 Jeffrey Epstein?
16 A. Plus six other passengers.
17 Q. Okay. Are those secret service?
18 A. Most likely.
19 Q. You flew in to the Naval air base with
20 Jeffrey Epstein, Ghislaine Maxwell and Sarah Kellen
21 only, right?
22 A. Right.
23 Q. And nobody stayed on the Naval air base?
24 A. No.
25 Q. And you are there to pick up Bill Clinton?

1 DAVID RODGERS
2 A. Yes.
3 Q. And you pick up Bill Clinton and six
4 passengers plus Mike?
5 A. Correct.
6 Q. Doug Band, who you have already explained
7 who that is with relation to Bill Clinton, and Janis
8 and Jessica.
9 A. Yes.
10 Q. Do you know who they are?
11 A. Yes.
12 Q. Who are Janis and Jessica?
13 A. Secret Service.
14 Q. How do you remember that?
15 A. Well, there is probably 8, 8 or 9 Secret
16 Service people there, two of them were women. The
17 other 7 -- and it was just easier to remember the
18 two women's names than the 7 other guys' names.
19 Q. This entry on January 22nd, 2002, Jessica,
20 is that the same or a different Jessica from --
21 A. On which one?
22 Q. Sure. Sorry. May 22nd. I think I
23 butchered the date before.
24 A. Right.
25 Q. May 22nd, 2002. Is that the same Jessica

1 DAVID RODGERS
2 as January 15th, 2002, flying with Jeffrey Epstein?
3 A. January 15th.
4 MR. REINHART: Flight 48.
5 BY MR. EDWARDS:
6 Q. Right. It is flight 48.
7 A. I'm don't think -- no, I they wouldn't be
8 the same Jessica, no.
9 Q. Okay. After you pick up President Bill
10 Clinton, where did you fly?
11 A. We went to Hong Kong.
12 Q. Do you know what the purpose was?
13 A. I believe he was giving a speech.
14 Q. All right. And then from there, where did
15 you fly?
16 A. That would be Shenzhen, Japan -- or China.
17 Q. Okay. And do you remember the purpose
18 there?
19 A. Speech.
20 Q. And then where did you fly?
21 A. Singapore.
22 Q. Again, another speech?
23 A. Another speech.
24 Q. During the course of these days, where did
25 President Bill Clinton sleep?

1 DAVID RODGERS
2 A. I guess at a hotel somewhere. I'm not
3 sure.
4 Q. Did he stay at the same place as Jeffrey
5 Epstein, Ghislaine Maxwell and Sarah Kellen?
6 MR. PAGLIUCA: Foundation.
7 THE WITNESS: I don't know.
8 BY MR. EDWARDS:
9 Q. All right. Were meals served on the
10 plane?
11 A. Something was served, but I don't know if
12 you would call it a meal. Probably. I'm sure we
13 had catering and stuff. I just don't recall.
14 Q. That was just typical back then to have
15 meals, especially for the President, right?
16 A. Normally we do not. And we probably did
17 have catering back then, but I don't recall.
18 Q. Okay. Where did you fly from Singapore?
19 A. Singapore, VTBD, I don't know. You have
20 your cheat sheet over there?
21 Q. VTBD, mine says Thailand.
22 A. I was going to guess Thailand.
23 Then from Thailand, I think we went to --
24 Q. My cheat sheet says Brunei?
25 A. Exactly. You don't want to go there.

1 DAVID RODGERS
2 Q. You don't?
3 A. No.
4 Q. Okay. Was the purpose a speech at each
5 location to the best of your knowledge?
6 A. To the best of my knowledge, it was.
7 Q. All right. Do you know why it was that
8 Jeffrey Epstein and Ghislaine Maxwell and Sarah
9 Kellen accompanied him?
10 A. No.
11 Q. And then did you leave?
12 MR. REINHART: Did you answer that
13 question?
14 THE REPORTER: He said no.
15 MR. REINHART: I didn't hear it.
16 BY MR. EDWARDS:
17 Q. Did you leave President Bill Clinton and
18 Doug Band and the Secret Service in Brunei?
19 A. Hmm. It is possible.
20 What is WRR?
21 Q. Not found. Sorry.
22 A. Not good.
23 Q. That is the only entry in here that is not
24 found.
25 But the next one, VCBI says Sri Lanka?

1 DAVID RODGERS
2 A. Okay. Then if that says Sri Lanka, then,
3 yes, we probably did leave Clinton in Brunei, I
4 think. And I think we went from there down to Bali.
5 We went to Bali without --
6 Q. Without Bill Clinton?
7 A. Yes.
8 Q. What was the purpose of the trip to Bali?
9 A. Just to get away.
10 Q. And then to Sri Lanka?
11 A. Sri Lanka was just a fuel stop on the way
12 to Paris. Two fuel stops.
13 Q. That's in Dubai?
14 A. Yes.
15 Q. And then you get to Paris?
16 A. Correct.
17 Q. And then you fly back to London?
18 A. Yes. Yes.
19 Q. All right. Do you remember the purpose of
20 the trip to London?
21 A. Yes.
22 Q. What was that?
23 A. We had to have our APU changed on the
24 airplane. It quit working in Paris. And we landed
25 there.

1 DAVID RODGERS
2 Q. All right. The next page, page 57,
3 June 21st. Flight 1570. Where is that flight
4 leaving from?
5 A. Palm Beach to the Bahamas.
6 Q. And who is on the flight from Palm Beach
7 to the Bahamas?
8 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
9 Kellen, Cindy Lopez, Jean-Luc Brunel, Virginia
10 Roberts.
11 Q. All right. And that is on June 21st?
12 A. Yes.
13 Q. All right. And then there is a couple of
14 entries that say "reposition."
15 A. Right.
16 Q. That is flying back to Palm Beach and then
17 back down to the Bahamas?
18 A. Correct. Yeah, we left them there. And
19 we flew the airplane home.
20 Q. And then did you leave out of the Bahamas
21 on the 23rd.
22 A. Yes.
23 Q. Up to Teterboro.
24 And who are your passengers on flight
25 1573?

1 DAVID RODGERS
2 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
3 Kellen, Cindy Lopez, Juliana Borres, I guess,
4 Jean-Luc Brunel, Melissa Stahl.
5 Q. A Virginia Roberts was taken to the
6 Bahamas. Do you know where she went from there?
7 A. I do not.
8 Q. Do you remember a Frederic Fekkai?
9 A. What is the name again?
10 Q. Fekkai, F-E-K-K-A-I. Frederic Fekkai?
11 A. First name?
12 Q. Fred.
13 A. Fred.
14 Q. Hairdresser?
15 A. The last name sounds familiar.
16 Q. All right. He's on a flight No. 116 on
17 the Boeing.
18 A. Uh-huh.
19 Q. June 27th?
20 A. Okay. I see.
21 Q. And there are -- it looks like a bunch of
22 passengers. Do you remember Daralyn Priest?
23 A. No. Where is she?
24 Q. Middle column.
25 A. Daralyn. Oh, yes, I see her. Right. I

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1 DAVID RODGERS
2 don't remember her.
3 Q. Do you remember that flight?
4 A. To Paris. Not really. It was a big
5 flight. We had a lot of people on it, which was
6 unusual, going to Paris. No, I don't.
7 Q. You don't remember it.
8 A. No.
9 Q. So you don't remember the purpose of the
10 flight?
11 A. No.
12 Q. July 2002, it is page 58. Go to flight
13 120.
14 A. Okay.
15 Q. LF?
16 A. That is Nice.
17 Q. And where do you go?
18 A. Tangiers.
19 Q. And then from Tangiers to?
20 A. To another place in Morocco. Marrakesh.
21 I think it is Marrakesh. I could be wrong on that
22 one. It is definitely Morocco.
23 Q. From there, is that where you pick up Bill
24 Clinton?
25 A. Let's see. GMME would be Rabat, the

1 DAVID RODGERS
2 capital of Morocco, I believe.
3 Q. Did you know before this flight that you
4 at some point would be picking up Bill Clinton?
5 A. I think we did, yes.
6 Q. Who was on the flight with Bill Clinton?
7 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
8 Kellen, Prince Andrew, Cindy Lopez, President
9 Clinton, Doug Band, Mike, with Secret Service and 8
10 Secret Service people. So probably 9 Secret Service
11 people.
12 Q. So Mike is a person that is also -- that
13 is?
14 A. He's Secret Service, yes. That is just
15 what I recall. He was the lead guy of the Secret
16 Service.
17 Q. Where do you take Bill Clinton?
18 A. We went to the Azores for a fuel stop and
19 then we went to JFK. Kennedy, New York.
20 Q. Then on August 5th, in the Gulfstream, on
21 flight 1586, you leave from Teterboro and go to
22 Santa Fe; is that correct?
23 A. Correct.
24 Q. On that flight, you have Jeffrey
25 Epstein -- sorry, Jeffrey Epstein, Sarah Kellen and

1 DAVID RODGERS
2 two females?
3 A. Yes.
4 Q. Do you know who those two females were?
5 A. No.
6 Q. How long does the plane, the Gulfstream,
7 stay in Santa Fe?
8 A. Let's see. 1586, Gulfstream. I don't
9 really know, because apparently, we had 1586 and the
10 next one I see is 1589. So it flew three places,
11 but I wasn't on that trip.
12 Q. 1587 and 1588 are missing, right?
13 A. That is what I'm saying.
14 Q. Because you are not on it?
15 A. I'm not on the trip.
16 Q. And 1589?
17 A. Uh-huh.
18 Q. Leaving out of Santa Fe, who are the
19 passengers?
20 A. Jeffrey Epstein, Ghislaine Maxwell, Sarah
21 Kellen, Cindy Lopez, Virginia Roberts, Dan Moran,
22 Eduardo, Alfred, Margarita and Nick Simmons.
23 Q. Do you know how Virginia Roberts got to
24 Santa Fe?
25 A. No.

1 DAVID RODGERS
2 Q. Is there any way to get to Santa Fe from,
3 say, Florida -- well, strike that.
4 MR. PAGLIUCA: Bus, train, car.
5 BY MR. EDWARDS:
6 Q. Did you ever know Virginia Roberts to take
7 a train?
8 A. Not that I'm aware.
9 Q. Did you ever know her to take a bus?
10 MR. REINHART: To go to New Mexico?
11 THE WITNESS: Not that I'm aware. Maybe
12 she has, but I don't know about it.
13 BY MR. EDWARDS:
14 Q. Okay. I have a picture of her on
15 horseback at the ranch, so who knows.
16 Let's see. August 17th, sorry,
17 August 18th.
18 A. Okay.
19 Q. From Teterboro to Palm Beach?
20 A. Right.
21 Q. Who are your passengers?
22 A. Jeffrey Epstein, Virginia Roberts, one
23 female.
24 Q. All right. Do you remember who that
25 female was?

Confidential

1 DAVID RODGERS

2 CERTIFICATE OF OATH

3 STATE OF FLORIDA)

4 COUNTY OF MIAMI-DADE)

5

I, the undersigned authority, certify
6 that DAVID RODGERS personally appeared before
me and was duly sworn.
7 WITNESS my hand and official seal
this 8th day of June, 2016.
8

9

Kelli Ann Willis, RPR, CRR
10 Notary Public, State of Florida
Commission FF928291, Expires 2-16-20
11 + + + + + + + + + + + + + + + + + +

12 CERTIFICATE

13 STATE OF FLORIDA)

14 COUNTY OF MIAMI-DADE)

15 I, Kelli Ann Willis, Registered
Professional Reporter and Certified Realtime
16 Reporter do hereby certify that I was
authorized to and did stenographically report the
17 foregoing deposition of DAVID RODGERS; that a
review of the transcript was not requested; and
18 that the transcript is a true record of my
stenographic notes.
19 I FURTHER CERTIFY that I am not a
relative, employee, attorney, or counsel of any
20 of the parties, nor am I a relative or employee of
any of the parties' attorney or counsel connected
21 with the action, nor am I financially interested
in the action.
22 Dated this 8th day of June, 2016.

23

24 KELLI ANN WILLIS, RPR, CRR

25

EXHIBIT 16
(Filed Under Seal)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

CASE NO. 15-CV-07433-RWS

---x

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--x

May 18, 2016
9:04 a.m.

C O N F I D E N T I A L

Deposition of JOHANNA SJOBERG, pursuant to notice, taken by Plaintiff, at the offices of Boies Schiller & Flexner, 401 Las Olas Boulevard, Fort Lauderdale, Florida, before Kelli Ann Willis, a Registered Professional Reporter, Certified Realtime Reporter and Notary Public within and for the State of Florida.

1 Q. Okay. Great.
2 All right. Do you know a female by the
3 name of Ghislaine Maxwell?
4 A. Yes.
5 Q. And when did you first meet Ms. Maxwell?
6 A. 2001. March probably. End of
7 February/beginning of March.
8 Q. And how did you meet her?
9 A. She approached me while I was on campus at
10 Palm Beach Atlantic College.
11 Q. And what happened when she approached you?
12 A. She asked me if I could tell her how to
13 find someone that would come and work at her house.
14 She wanted to know if there was, like, a bulletin
15 board or something that she could post, that she was
16 looking for someone to hire.
17 Q. And what did you discuss with her?
18 A. I told her where she could go to -- you
19 know, to put up a listing. And then she asked me if
20 I knew anyone that would be interested in working
21 for her.
22 Q. Did she describe what that work was going
23 to be?
24 A. She explained that she lived in Palm Beach
25 and didn't want butlers because they're too stuffy.

1 And so she just liked to hire girls to work at the
2 house, answer phones, get drinks, do the job a
3 butler would do.
4 Q. And did she tell you what she would pay
5 for that kind of a job?
6 A. At that moment, no, but later in the day,
7 yes.
8 Q. And what did she say?
9 A. Twenty dollars an hour.
10 Q. Was there anybody else with Ms. Maxwell
11 when you met her?
12 A. There was another woman with her. I don't
13 recall her or what she looks like or how old she
14 was.
15 Q. And what happened next?
16 A. And then she asked me if I would be
17 interested in working for her. And she told me that
18 she was -- I could trust her and that I could jump
19 in her car and go check out the house at that moment
20 if I wanted.
21 And so I said, Sure, let's do it, and went
22 to her home with her.
23 Q. And where was that home?
24 A. In Palm Beach.
25 Q. And did she describe that home as being

1 magazines.
2 She and I went -- she wanted to take me
3 shopping to Worth Avenue, but it was a Sunday and
4 Nieman Marcus was closed, so we went back to, like,
5 a little book store. And I remember she bought, I
6 think, five pairs of reading glasses because she
7 thought Jeffrey would like them. He had them all
8 over the house. On every table there was reading
9 glasses.
10 And that's about it. It was a pretty
11 simple day.
12 Q. Were you paid that day for that work?
13 A. Yes.
14 Q. And how much were you paid? Do you
15 remember?
16 A. I don't remember how many hours I was
17 there -- I was there. She paid me cash.
18 Q. So Maxwell paid you?
19 A. Yes.
20 Q. And then was she the one who trained you
21 with what -- with respect to what you were supposed
22 to do during the day, directed you to, like you
23 said, go to --
24 A. I believe she was the one that was kind of
25 showing me around.

1 Q. And how long did you work in that position
2 answering phones and doing --
3 A. Just that one day.
4 Q. Just that one day.
5 And did your duties change?
6 A. Well, the next time she called me, she
7 asked me if I wanted to come over and make $100 an
8 hour rubbing feet.
9 Q. And what did you think of that offer?
10 A. I thought it was fantastic.
11 Q. And did you come over to the house for
12 that purpose?
13 A. Yes.
14 Q. And when you came over to the house, was
15 Maxwell present?
16 A. I don't recall.
17 Q. And what happened that second time you
18 came to the house?
19 A. At that point, I met Emmy Taylor, and she
20 took me up to Jeffrey's bathroom and he was present.
21 And her and I both massaged Jeffrey. She was
22 showing me how to massage.
23 And then she -- he took -- he got off the
24 table, she got on the table. She took off her
25 clothes, got on the table, and then he was showing

1 me moves that he liked. And then I took my clothes
2 off. They asked me to get on the table so I could
3 feel it. Then they both massaged me.
4 Q. So it was more than a foot massage at that
5 point?
6 A. Yeah, it was mostly, like, legs and back.
7 Q. Was everybody in the room without clothes
8 on?
9 A. When they were on the massage table, yes.
10 Q. Did they -- when they got off the massage
11 table to perform the massage, did they dress or
12 did --
13 A. Yes.
14 Q. They dressed.
15 And do you recall who paid you for that
16 first day that you did the massages?
17 A. I don't recall.
18 Q. Do you recall whether Maxwell was at the
19 house during that first day when you were doing the
20 massage with Emmy and Jeffrey?
21 MS. MENNINGER: Objection, asked and
22 answered.
23 BY MS. McCAWLEY:
24 Q. You can answer.
25 A. I don't recall.

1 Q. Who did Emmy work for?
2 A. Ghislaine.
3 Q. Did Maxwell ever refer to Emmy by any
4 particular term?
5 A. She called her her slave.
6 Q. You said your job duties changed. Did you
7 start to travel as part of your job with Jeffrey and
8 Ghislaine?
9 A. Yes. The next time they called me, they
10 asked me to go to New York.
11 Q. And did you -- do you recall when that was
12 approximately?
13 A. That was Easter of 2001.
14 Q. And do you recall who was on the plane
15 with you for that trip?
16 MS. MENNINGER: Objection, leading, form.
17 MS. McCAWLEY: Actually, I'm going to stop
18 really quickly and I'm going to ask for the
19 next exhibit, please.
20 MS. MENNINGER: This is 3?
21 MS. McCAWLEY: Yes. I'm going to mark
22 this as Exhibit 3 for purposes of the
23 deposition.
24
25

1 leading.
2 THE WITNESS: Jeffrey Epstein; Ghislaine
3 Maxwell; AP and PK are the two women I do not
4 recall; Virginia Roberts; and myself.
5 BY MS. McCAWLEY:
6 Q. Do you recall how you flew back from the
7 location in the US Virgin Islands?
8 A. They put me on a commercial flight. I
9 wanted to be home in time for Easter.
10 Q. When you say "they," do you recall who
11 made those arrangements for you?
12 A. It could have been Ghislaine.
13 Q. Did you -- do you recall performing
14 massages while you were in the US Virgin Islands?
15 A. Yes.
16 Q. Who was involved in -- was there more than
17 one?
18 A. Yes. I massaged Ghislaine at one point.
19 And I massaged Jeffrey, Virginia and I, both, on the
20 beach.
21 Q. Were you dressed during the massage that
22 was on the beach?
23 A. Yes. Bikinis probably, most likely.
24 Q. Do you recall what Virginia was wearing?
25 A. I believe she was wearing a bathing suit,

1 to object and then you can still answer. No
2 one is going to stop you from answering. I
3 just need to get the objection on the record,
4 in the same way she needs to be able to talk
5 before you. My apologies. I'm not trying to
6 cut you off, but I am supposed to get it in
7 before you answer.
8 BY MS. McCAWLEY:
9 Q. Did Jeffrey ever tell you why he received
10 so many massages from so many different girls?
11 MS. MENNINGER: Objection, hearsay.
12 BY MS. McCAWLEY:
13 Q. You can answer.
14 A. He explained to me that, in his opinion,
15 he needed to have three orgasms a day. It was
16 biological, like eating.
17 Q. And what was your reaction to that
18 statement?
19 A. I thought it was a little crazy.
20 Q. And what did -- do you recall what -- when
21 you observed the other females giving massages, do
22 you recall what they would dress like? Did they
23 wear scrubs or did they typically wear normal
24 clothes?
25 A. Normal clothes.

1 MS. MENNINGER: Objection, leading.
2 BY MS. McCAWLEY:
3 Q. Do you believe that from your
4 observations, Maxwell and Epstein were boyfriend and
5 girlfriend?
6 A. Initially, yes.
7 Q. Did Maxwell ever share with you whether it
8 bothered her that Jeffrey had so many girls around?
9 MS. MENNINGER: Objection, leading,
10 hearsay.
11 THE WITNESS: No. Actually, the opposite.
12 BY MS. McCAWLEY:
13 Q. What did she say?
14 A. She let me know that she was -- she would
15 not be able to please him as much as he needed and
16 that is why there were other girls around.
17 Q. Did there ever come a time -- did you ever
18 take a photography class in school?
19 A. Yes.
20 Q. And did there ever come a time when
21 Maxwell offered to buy you a camera?
22 A. Yes.
23 MS. MENNINGER: Objection, leading.
24 BY MS. McCAWLEY:
25 Q. Did Maxwell ever offer to buy you a

1 camera?
2 MS. MENNINGER: Objection, leading.
3 THE WITNESS: Yes.
4 BY MS. McCAWLEY:
5 Q. Was there anything you were supposed to do
6 in order to get the camera?
7 MS. MENNINGER: Objection, leading.
8 THE WITNESS: I did not know that there
9 were expectations of me to get the camera until
10 after. She had purchased the camera for me,
11 and I was over there giving Jeffrey a massage.
12 I did not know that she was in possession of
13 the camera until later.
14 She told me -- called me after I had left
15 and said, I have the camera for you, but you
16 cannot receive it yet because you came here and
17 didn't finish your job and I had to finish it
18 for you.
19 BY MS. McCAWLEY:
20 Q. And did you -- what did you understand her
21 to mean?
22 A. She was implying that I did not get
23 Jeffrey off, and so she had to do it.
24 Q. And when you say "get Jeffrey off," do you
25 mean bring him to orgasm?

1 A. Yes.
2 Q. Did Ghislaine ever describe to you what
3 types of girls Jeffrey liked?
4 A. Model types.
5 Q. Did Ghislaine ever talk to you about how
6 you should act around Jeffrey?
7 A. She just had a conversation with me that I
8 should always act grateful.
9 Q. Did Jeffrey ever tell you that he took a
10 girl's virginity?
11 A. He did not tell me. He told a friend of
12 mine.
13 Q. And what do you recall about that?
14 MS. MENNINGER: Objection, hearsay,
15 foundation.
16 THE WITNESS: He wanted to have a friend
17 of mine come out who was cardio-kickboxer
18 instructor. She was a physical trainer.
19 And so I brought her over to the house,
20 and he told my friend Rachel that -- he said,
21 You see that girl over there laying by the
22 pool? She was 19. And he said, I just took
23 her virginity. And my friend Rachel was
24 mortified.
25

1 BY MS. McCAWLEY:
2 Q. Based on what you knew, did Maxwell know
3 that the type of massages Jeffrey was getting
4 typically involved sexual acts?
5 MS. MENNINGER: Objection, foundation,
6 leading.
7 THE WITNESS: Yes.
8 BY MS. McCAWLEY:
9 Q. What was Maxwell's main job with respect
10 to Jeffrey?
11 MS. MENNINGER: Objection, foundation.
12 THE WITNESS: Well, beyond companionship,
13 her job, as it related to me, was to find other
14 girls that would perform massages for him and
15 herself.
16 BY MS. McCAWLEY:
17 Q. Did Maxwell ever refer to the girls in a
18 particular way?
19 A. At one point when we were in the islands,
20 we were all watching a movie and she called us her
21 children.
22 Q. Did anybody respond to that?
23 A. I don't recall.
24 Q. Did she ever refer to herself as a mother?
25 A. Yes, like a mother hen.

1 Q. Do you remember anything notable about the
2 phone calls?
3 A. I just remember I always had to say, He's
4 unavailable, can I take a message?
5 Q. And where did you take a message?
6 A. On a little notepad next to the phone.
7 Q. Do you recall any small children calling
8 the house that day?
9 A. No.
10 Q. Were you speaking to anyone about their
11 school experience or anything like that?
12 A. No.
13 Q. Did you take any messages for famous
14 people?
15 A. They could have been famous and I would
16 have been clueless.
17 Q. Did you take messages at any other point
18 during the time that you worked with Jeffrey?
19 A. No.
20 Q. And you said you remember at the end of
21 that day being paid by Ghislaine?
22 A. Yes.
23 Q. And you were paid for doing the errands
24 and answering phones and whatever else you did?
25 A. Yes.

1 Q. When you came upstairs, where was Virginia
2 sitting?
3 A. I don't remember.
4 Q. Do you remember what she was wearing?
5 A. No.
6 Q. She was already there when you got back
7 from sightseeing?
8 A. Yes.
9 Q. Tell me what happened with the caricature.
10 A. Ghislaine asked me to come to a closet.
11 She just said, Come with me. We went to a closet
12 and grabbed the puppet, the puppet of Prince Andrew.
13 And I knew it was Prince Andrew because I had
14 recognized him as a person. I didn't know who he
15 was.
16 And so when I saw the tag that said Prince
17 Andrew, then it clicked. I'm like, that's who it
18 is.
19 And we went down -- back down to the
20 living room, and she brought it in. It was just
21 funny because -- he thought it was funny because it
22 was him.
23 Q. Tell me how it came to be that there was a
24 picture taken.
25 MS. McCAWLEY: Objection.

1 THE WITNESS: I just remember someone
2 suggesting a photo, and they told us to go get
3 on the couch. And so Andrew and Virginia sat
4 on the couch, and they put the puppet, the
5 puppet on her lap.
6 And so then I sat on Andrew's lap, and I
7 believe on my own volition, and they took the
8 puppet's hands and put it on Virginia's breast,
9 and so Andrew put his on mine.
10 BY MS. MENNINGER:
11 Q. And this was done in a joking manner?
12 MS. McCAWLEY: Objection.
13 THE WITNESS: Yes.
14 BY MS. MENNINGER:
15 Q. Do you recall a photo being taken of that
16 event?
17 A. Yes.
18 Q. You've never seen the photo?
19 A. No.
20 Q. You don't know whose camera it was?
21 A. No.
22 Q. Virginia was sitting on the couch next to
23 Andrew, not in a big leather armchair?
24 A. Maybe. I'm just trying to remember how I
25 remember it.

1 exposed her bra, and she grabbed it and pulled it
2 down.
3 Q. Anything else?
4 A. That was the conversation that he had told
5 her that he had taken this girl's virginity, the
6 girl by the pool.
7 Q. Okay. Did Maxwell ever say to you that it
8 takes the pressure off of her to have other girls
9 around?
10 A. She implied that, yes.
11 Q. In what way?
12 A. Sexually.
13 Q. And earlier Laura asked you, I believe, if
14 Maxwell ever asked you to perform any sexual acts,
15 and I believe your testimony was no, but then you
16 also previously stated that during the camera
17 incident that Maxwell had talked to you about not
18 finishing the job.
19 Did you understand "not finishing the job"
20 meaning bringing Jeffrey to orgasm?
21 MS. MENNINGER: Objection, leading, form.
22 BY MS. McCAWLEY:
23 Q. I'm sorry, Johanna, let me correct that
24 question.
25 What did you understand Maxwell to mean

1 when she said you hadn't finished the job, with
2 respect to the camera?
3 MS. MENNINGER: Objection, leading, form.
4 THE WITNESS: She implied that I had not
5 brought him to orgasm.
6 BY MS. McCAWLEY:
7 Q. So is it fair to say that Maxwell expected
8 you to perform sexual acts when you were massaging
9 Jeffrey?
10 MS. MENNINGER: Objection, leading, form,
11 foundation.
12 THE WITNESS: I can answer?
13 Yes, I took that conversation to mean that
14 is what was expected of me.
15 BY MS. McCAWLEY:
16 Q. And then you mentioned, I believe, when
17 you were testifying earlier that Jeffrey told you a
18 story about sex on the plane. What was that about?
19 MS. MENNINGER: Objection, hearsay.
20 THE WITNESS: He told me one time Emmy was
21 sleeping on the plane, and they were getting
22 ready to land. And he went and woke her up,
23 and she thought that meant he wanted a blow
24 job, so she started to unzip his pants, and he
25 said, No, no, no, you just have to be awake for

1 A. No.
2 Q. Was it in the context of anything?
3 A. About the camera that she had bought for
4 me.
5 Q. What did she say in relationship to the
6 camera that she bought for you and taking
7 photographs of you?
8 A. Just that Jeffrey would like to have some
9 photos of me, and she asked me to take photos of
10 myself.
11 Q. What did you say?
12 A. I don't remember saying no, but I never
13 ended up following through. I think I tried once.
14 Q. This was the pre-selfie era, correct?
15 A. Exactly.
16 Q. I want to go back to this: You testified
17 to two things just now with Sigrid that you said
18 were implied to you.
19 A. Okay.
20 Q. The first one was it would take pressure
21 off of Maxwell to have more girls around?
22 A. Right.
23 Q. What exactly did Maxwell say to you that
24 led you to believe that was her implication?
25 A. She said she doesn't have the time or

1

2 C E R T I F I C A T E

3 STATE OF FLORIDA)

: ss

4 COUNTY OF MIAMI-DADE)

5 I, KELLI ANN WILLIS, a Registered

6 Professional, Certified Realtime Reporter and

7 Notary Public within and for The State of

8 Florida, do hereby certify:

9 That JOHANNA SJOBERG, the witness whose

10 deposition is hereinbefore set forth was duly

11 sworn by me and that such Deposition is a true

12 record of the testimony given by the witness.

13 I further certify that I am not related

14 to any of the parties to this action by blood

15 or marriage, and that I am in no way interested

16 in the outcome of this matter.

17 IN WITNESS WHEREOF, I have hereunto set

18 my hand this 18th day of May, 2016.

19

20 ____________________________

KELLI ANN WILLIS, RPR, CRR

21

22

23

24

25

EXHIBIT 17
(Filed Under Seal)

1 UNITED STATES DISTRICT COURT
for the
2 Southern District of New York
3
Civil Action No. 15-cv-07433-RWS
4
VIRGINIA GIUFFRE,
5
Plaintiff,
6
vs.
7
GHISLAINE MAXWELL,
8
Defendant.
9 ---
10 VIDEO-DEPOSITION OF: Sky Roberts
11
TAKEN BY: Defendant
12
REPORTED BY: Karla Layfield, RMR
13 Stenographic Court Reporter
Notary Public
14 State of Florida at Large
15 DATE AND TIME: May 20, 2016; 8:33 a.m.
16 PLACE: Millhorn Law Firm
11294 North US Highway 301
17 Oxford, Florida
18 APPEARANCES: Laura A. Menninger, Esquire
HADDON, MORGAN & FOREMAN, PC
19 150 East 10th Avenue
Denver, Colorado 80203
20 Attorney for Defendant
21 Brad Edwards, Esquire
Farmer, Jaffe, Weissing, Edwards,
22 FISTOS & LEHRMAN, PL
425 Andrews Avenue, Suite 2
23 Fort Lauderdale, Florida 33301
Attorney for Plaintiff
24
25 ALSO PRESENT: Kenneth Sarcony, Videographer

1 Q Do you remember there being a job posting that
2 you felt like was appropriate for Virginia or did you just
3 go out and talk to the woman who ran the spa area on your
4 own?
5 A I just talked to Angela.
6 Q Okay. Do you recall whether this was intended
7 to be a full-time job?
8 A I don't remember if it was full time or just
9 summer jobs or, you know, during season. It was probably
10 for a season because Mar-a-Lago is seasonal.
11 I mean, I was there year round but a lot of
12 people are seasonal, you know, because it's like
13 snowbirds, you know, summertime comes and nobody wants to
14 be down in south Florida.
15 Q What would you call the season, the seasonal
16 aspect of Mar-a-Lago? What's the season?
17 A Probably from September or October to, you know,
18 maybe May, I guess.
19 Q Is that the coolest time?
20 A Times of the year, yes.
21 Q And it's more guests that come during that
22 period of time?
23 A Yes.
24 Q And is there more staff brought on during that
25 period of time?

1 we'll call her Angela.
2 A We've got to call her something, but, you know,
3 I didn't really know what her job title was, but I was
4 glad that they would give her a job.
5 Q Right.
6 A You know, and that, you know, I was hoping she
7 would be happy; that way she could, you know, go back and
8 forth to work with me. She didn't have to drive or
9 nothing.
10 Q Did you drive to and from work with her?
11 A Yes. Pretty sure I did, yeah.
12 Q Do you remember her hours being relatively the
13 same as yours?
14 A I'm pretty sure they were. Yes.
15 Q Do you recall her being in school at the same
16 time?
17 A No, I don't recall. I don't remember if she was
18 in school or not.
19 Q Is it possible it was over, say, winter break
20 or --
21 A I don't remember. I'm sorry. This is so long
22 ago. I mean, some things stick in my mind but some things
23 I just don't remember.
24 Q Do you remember whether Virginia wore a uniform?
25 A Yes, I think she did. Yeah. I think everybody

1 Q So you don't know if it was a couple days or a
2 couple weeks or a couple months or a couple years?
3 Anything in that --
4 A Well, it wasn't a couple years. It might have
5 been two weeks to two months. I don't know. It wasn't a
6 whole long time, you know.
7 Q Where were you when Virginia told you she might
8 be going to try to get this other job?
9 A Probably at work. She might have told me, like,
10 at lunch or whatever. I don't remember. That was so many
11 years ago. I just remember she said Ms. Maxwell was going
12 to, you know, get her a job with Jeffrey Epstein and learn
13 massage therapy. And I thought, well, that's great, you
14 know, because learning new jobs is all about life, you
15 know.
16 You've got to learn each -- you know, I've
17 learned a lot of different things over my lifetime so it's
18 good to learn every new job you can because that can help
19 you later in life and that's what I think I told her.
20 Q Okay. So the best you can recall today is you
21 had a conversation with her sometime at lunch perhaps at
22 Mar-a-Lago where she told you she was going to try to get
23 another job?
24 A Yes. And I thought that was a good thing.
25 Q Do you know now that you recall that, what

1 A No.
2 Q Did she ever call you from that home?
3 A Not that I know of.
4 Q Was this when she was still living at home with
5 you on Rackley Road?
6 A Yes. Yes.
7 Q Not Rackley Drive.
8 A Rackley Road.
9 Q Do you know whether Michael was living with you
10 at Rackley Road at the time or not?
11 A I don't think so. I don't remember. I didn't
12 care for Michael. Of course, what parent cares for your
13 daughter's boyfriend.
14 Q Why didn't you care for Michael?
15 A I didn't think anybody was good enough for my
16 daughter but that's just me.
17 Q I suspect you're right about all fathers.
18 Do you remember her telling you anything about
19 what her job with Mr. Epstein was going to be or was?
20 A She said it was going to be massage therapy.
21 Q Okay. Did she tell you she was getting some
22 training?
23 A Yes.
24 Q Did she tell you about the training?
25 A No. She just said she was being trained in

1 massage therapy.
2 Q All right. When she came home at night from
3 working with Mr. Epstein, did she look distressed to you
4 in any way?
5 A Not that I remember.
6 Q Okay. Did she report any complaints about her
7 job with Mr. Epstein?
8 A Not to me.
9 Q Okay. Did she report them to anyone else who
10 then reported them to you?
11 A No.
12 Q Your wife, for example?
13 A I have no idea. Like I said, if she did tell my
14 wife, I never heard about it.
15 Q Okay. Have you ever met Ms. Maxwell?
16 A Not that I remember ever meeting her.
17 Q Do you know what she looks like?
18 A No.
19 Q Did you ever meet anyone else who worked with
20 Mr. Epstein?
21 A No.
22 Q Do you remember anyone else who worked for
23 Mr. Epstein bringing your daughter home, for example?
24 A No.
25 Q Did your daughter ever move into the home where

1 Q Okay. But your hours, if I understood you
2 right, were approximately 7:00 a.m. to 3:00 p.m.?
3 A Yes.
4 Q And Tuesday through Saturday?
5 A Yes.
6 Q Those hours would be the same time as somebody
7 her age would have been in high school?
8 A Yes.
9 Q Okay. So does that -- does that give an
10 indication to you that the short period of time she was
11 working was during the summer when there was not school?
12 A It seems to be that way.
13 Q Okay.
14 A I mean, to me, yeah.
15 Q It could have been a summer job?
16 A Yes, it could have been.
17 Q Okay. You would not have, as a father, had her
18 working somewhere instead of going to school?
19 A No, I wouldn't.
20 Q And the day that Virginia came and spoke to you
21 about meeting someone named Ms. Maxwell who was offering
22 her another job, do you remember the conversation that you
23 had with Virginia on that day?
24 A No, not really. I just remember Virginia saying
25 that, you know, she met Ms. Maxwell at the spa and that

1 Q And there it describes her job at Mar-a-Lago as
2 lasting from August 2000 to September of 2001. Do you see
3 that?
4 A Yes.
5 Q Does that refresh your memory about how long she
6 was working there?
7 MR. EDWARDS: Form.
8 THE WITNESS: She didn't work that long.
9 MS. MENNINGER: Okay.
10 THE WITNESS: Like I say, it was more, like,
11 a couple of weeks. It wasn't --
12 BY MS. MENNINGER:
13 Q Well, earlier you testified it, might have been
14 a couple of months?
15 A Well, you know, for me, two weeks, two months, I
16 mean, I don't even remember how long I worked at
17 Mar-a-Lago. I told you I worked there six years and
18 according to them, it was, like, three years. Seemed like
19 six.
20 Q Well, earlier you testified that Mar-a-Lago was
21 more of a seasonal place, correct?
22 A Yes, well, it is seasonal. But I mean, they
23 could be open up the spa area during the summer too
24 because I'm sure a lot of people in Palm Beach come to get
25 massages and things like that. I mean, you know, the only

1 part they close off is where the chefs and all that, where
2 they didn't do any more big events and stuff.
3 Q Okay.
4 A But I think the kitchen was still open. I mean,
5 they had a dining room.
6 Q So if she didn't work there that long
7 August 2000 -- even though August is in the summer -- it
8 would not be unusual in your mind?
9 A No.
10 Q Okay. So she could have started working in
11 August of 2000, correct?
12 A She could have, yeah.
13 Q And while you don't think she worked all the way
14 until September of 2001 --
15 A No.
16 Q -- that would be consistent with your
17 recollection of it being more seasonal in the fall,
18 September --
19 MR. EDWARDS: Object to the form.
20 THE WITNESS: Yes.
21 BY MS. MENNINGER:
22 Q So if she worked in the fall, September,
23 October, something like that, that seems likes that
24 accords with your memory, correct?
25 MR. EDWARDS: Object to the form.

1 C E R T I F I C A T E

2 STATE OF FLORIDA

3 COUNTY OF MARION

4 I, Karla Layfield, RMR, Stenographic Court

5 Reporter, do hereby certify that I was authorized to and

6 did stenographically report the foregoing deposition of

7 Sky Roberts; that said witness was duly sworn to testify

8 truthfully; and that the foregoing pages, numbered 1

9 through 142, inclusive, constitute a true and correct

10 record of the testimony given by said witness to the best

11 of my ability.

12 I FURTHER CERTIFY that I am not a relative or

13 employee or attorney or counsel of any of the parties

14 hereto, nor a relative or employee of such attorney or

15 counsel, nor am I financially interested in the action.

16 WITNESS MY HAND this _____ day of May, 2016, at

17 Ocala, Marion County, Florida.

18

19 ______________________________

Karla Layfield, RMR

20 Stenographic Court Reporter

21

22

23

24

25

EXHIBIT 18
(Filed Under Seal)

Page 1

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
CASE No.08-CV-80119-CIV-MARRA/JOHNSON

JANE DOE NO. 2,

Plaintiff,
-vs-

JEFFREY EPSTEIN,

Defendant.

Related cases:
08-80232, 08-80380, 98-80381, 08-80994, 08-80993, 08-80811, 08-80893, 09-80469, 09-80591, 09-80656, 09-80802, 09-81092

VIDEOTAPED DEPOSITION OF JUAN ALESSI
VOLUME I

Tuesday, September 8, 2009
10:12 a.m. - 3:45 p.m.

2139 Palm Beach Lakes Boulevard
West Palm Beach, Florida 33401

Reported By:
Sandra W. Townsend, FPR
Notary Public, State of Florida
PROSE COURT REPORTING AGENCY
West Palm Beach Office

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Page 4

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2 E X H I B I T S
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NUMBER	DESCRIPTION	PAGE
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1 MS. EZELL: I'm going to ask -- I don't know
2 whether you've still been serially designating
3 Exhibits or whether we're doing them separately for
4 deposition.
5 MR. CRITTON: I think we cannot trust that
6 people will do them serially. I'd do them with
7 each one.
8 MS. EZELL: Then would you mark this, please,
9 as Exhibit 1 to this deposition.
10 And I'm just going to state on the record that
11 I will keep that original. We will not attach it
12 to the deposition.
13 (Exhibit number 1 was marked for
14 identification purposes and retained by Counsel for the
15 Plaintiffs.)
16 THE WITNESS: Yes, that's --
17 BY MS. EZELL:
18 Q. Can you identify that -- the young woman in
19 those pictures?
20 A. Yes.
21 Q. Who is it?
22 A. That's V. -- V. Now that you says R., that
23 is V.R. definite, a hundred percent.
24 MR. CRITTON: Let me just note my objection,
25 as I did in A. Rod's deposition or Mr. Rodriguez's

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1 deposition, that I know you're going to confiscate
2 Exhibit number 1. I think it's inappropriate. I
3 think I should be allowed to have a copy of
4 Exhibits that are being used in deposition. But
5 I'll file a motion with the Court so we don't get
6 into a pulling match over your Exhibits.
7 MR. BERGER: I would ask that the court
8 reporter initial that.
9 MS. EZELL: Sure.
10 Oh, you did?
11 MR. WILLITS: She marked it.
12 MR. BERGER: Did she put her initials or did
13 she just put a number or a letter?
14 MR. CRITTON: She's nodding that she did
15 everything that she usually does, which means,
16 initials, date and number.
17 MR. MERMELSTEIN: You can talk.
18 MR. WILLITS: But when you talk, use your
19 initials.
20 BY MS. EZELL:
21 Q. How old did you think V.R. was at the time she
22 began coming to Mr. Epstein's home?
23 A. She could have been 17, 18, 19.
24 Q. Could she have also been 15?
25 MR. CRITTON: Form.

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1 THE WITNESS: Could have been. But, you know,
2 I am not -- I don't think I am a very good judge of
3 ages. If you ask me how old you are, I really
4 couldn't tell you.
5 MR. CRITTON: Kathy thinks she's 25.
6 MS. EZELL: In my dreams.
7 THE WITNESS: Now, again, I must tell you, I
8 was never told to check any i.d.s on any of the
9 people who work at the house.
10 BY MS. EZELL:
11 Q. I understand that. And, so, I think I'm just
12 trying to establish that you didn't consider it part of
13 your job description to worry about or consider the
14 ages --
15 A. No.
16 Q. -- of the young women that came there?
17 A. Absolutely not. Absolutely not.
18 Q. And, so, you never really focused on that or
19 particularly thought about it if they seemed young?
20 MR. CRITTON: Form.
21 THE WITNESS: I don't -- I didn't see that
22 many young girls, you know, young, underage girls
23 at the house. I never saw except the two girls
24 that I mentioned that I think it was underage was
25 N. for sure because she was still in high school.

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1 And she -- she had dinner with her mother, a couple
2 times with her mother. And she become an actress.
3 She's an actress and she has done movies. And he
4 help her in her career.
5 That's the only girl that I knew she was young
6 because she was going to high school and I pick her
7 up from high school sometimes. But she was not a
8 massage therapist. She will go for dinner. And
9 they will go for the movies and she sang sometimes
10 because she was a singer. So she sung at the
11 house. Beautiful girl. Very talented.
12 That's the only girl that I know that it
13 was -- I would says, underage.
14 BY MS. EZELL:
15 Q. Okay. Did -- who told you that V.R. was a
16 massage therapist?
17 A. Nobody.
18 Q. Did you assume that she was a massage
19 therapist because you were told she was coming to give a
20 massage?
21 A. No. I assumed she was a massage therapy
22 because I was -- I drove Ms. Maxwell to Mar-a-lago,
23 Donald Trump's residence. And I wait in the car while
24 Ms. Maxwell got a -- I think it was a facial or massage.
25 I don't know. But that day I remember this girl, V.,

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1 walking down from the main lobby towards the spa of
2 Mar-a-lago. And I was driving Ms. Maxwell up, up the
3 ramp. It's a little ramp there.
4 And Ms. Maxwell says, stop. And she went and
5 talked to -- she went inside.
6 And that afternoon around 5:00 I saw V. came.
7 She came to the house already, so she was there already.
8 That was the first day I knew. And then she would come
9 regularly.
10 Q. Did you ever meet any of V.'s family?
11 A. No. I think she was -- one time I think her
12 father drove her there. And I met -- I don't know if it
13 was the boyfriend or husband or -- but he had to wait,
14 make him wait outside while she was at the house.
15 Q. Do you know the name or recognize the name
16 Tony Santiago?
17 A. I think it was him.
18 Q. That was her --
19 A. I know he had an old beat-up car, Camaro or
20 Mustang. I know it was very old car that I make him
21 wait on the street one time. I make him come out of the
22 driveway because we have to move some cars around.
23 Q. Did there ever come a time when Tony Santiago
24 was welcome in the kitchen?
25 A. I think he came once in the kitchen, but

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1 Ms. Maxwell told me to get him out.
2 Q. Did she tell you why?
3 A. No. She didn't -- I guess she didn't want to
4 become, you know, everybody -- because some of these
5 people came with their husbands and they wait outside.
6 And I guess she didn't want this to become a norm for
7 everybody to bring their companions while they have --
8 they will do a massage for her.
9 Q. During the time you were there, did you ever
10 know of Tony Santiago bringing any other girls to
11 Mr. Epstein?
12 A. No. I knew that sometimes I saw V. bring
13 other girls with her, not Tony Santiago.
14 Q. Do you remember the names of any of those
15 girls --
16 A. No, I don't.
17 Q. -- that V. brought?
18 A. That was at the end of my stay there. No.
19 That was a very -- at the very end of the last month of
20 my stay.
21 Q. Did you give -- I don't believe I asked you,
22 but if I did, forgive me. Did you give us an
23 approximate year in which you were taking Ms. Maxwell to
24 Mar-a-lago and saw V.R. for the first time?
25 A. That was at the -- at the end of my stay

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1 there. So I would says, between three months maybe
2 before I left. And I think I left at the end of the
3 year, so it could have been -- I remember it was a very
4 hard day because I had to wait in the sun outside in a
5 convertible and I was dying, waiting for an hour for
6 Ms. Maxwell. I think it was in the summer of 2002.
7 Q. And if I remember correctly, you left in
8 November or December of 2002?
9 A. Yes.
10 Q. So that might have been perhaps July or August
11 of 2002?
12 A. Uh-huh.
13 Q. And, so, as I understand it, you only saw V.R.
14 come to that house during the last three months of your
15 time at Mr. Epstein's?
16 A. Yes.
17 Q. Do you have any -- any sense or can you
18 approximate how many times she came?
19 A. I cannot give you a number, but I would says,
20 two, three times a week.
21 Q. You mentioned that sometimes you would have to
22 call these massage therapists in the middle of the
23 night. Did you ever have to call V. for Mr. Epstein in
24 the middle of the night?
25 MR. CRITTON: Form.

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1 THE WITNESS: No. No.
2 BY MS. EZELL:
3 Q. Did there come a time while you were there
4 that V.R. stayed in the house?
5 MR. CRITTON: Form.
6 THE WITNESS: I don't think so. I cannot
7 remember. No.
8 BY MS. EZELL:
9 Q. How many bedrooms were there upstairs?
10 A. One, two, three -- one, two, three, four --
11 four -- so that would be five, five bedrooms.
12 Q. Five. And, so, would one have been
13 Mr. Epstein's bedroom?
14 A. Yes. His quarters was big, huge quarters.
15 Q. Sort of a suite?
16 A. Yeah. And he has -- this is the room. His
17 bathroom was here and her bathroom was here. The main
18 room was here. And we have -- it was two sets of doors
19 before -- two sets of double doors before you can go
20 into the suite. There was one on top of the stairway
21 and one in the middle of the hallway. And then you walk
22 into the -- into the suite.
23 Q. Okay. And you -- you just put a red eight by
24 11 folder in front of you?
25 A. Yeah.

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1 A. Yes. Before she was married, yeah. They
2 split up and she went her own way.
3 Q. Did she marry a Glen Dubin (phonetics)?
4 A. That's correct. And Mr. Dubin used to come to
5 the house, too.
6 Q. Do you know, was Sarah Kellen ever one of the
7 massage therapists before she became an assistant?
8 A. I don't know if she was a massage therapist.
9 I don't remember setting up a massage table for her. I
10 think she was an assistant. And she would call -- at
11 the end of my stay, I was -- tried to pull aside from my
12 obligations and Sarah was doing all the phone calls and
13 all the arrangement and all the looking out for these
14 girls for the -- for massage therapists. They were
15 constantly.
16 Q. When did that role get transferred from you to
17 Ms. Maxwell, the role of looking after girls and calling
18 the girls?
19 A. I didn't look after -- out for girls.
20 Ms. Maxwell was the one that recruit -- I remember one
21 occasion or two occasions she would says to me, John,
22 give me a list of all the spas in Palm Beach County.
23 And I will drive her from one to the other one to PGA
24 and Boca. And she will go in, drop credit cards -- not
25 credit cards, but business cards, and she come out. And

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1 then we go to -- she will recruit the girls. Was
2 never -- never done by me or Mr. Epstein or anybody
3 else, that I know.
4 I don't know about Sarah because Sarah was
5 there at the last, last -- probably last weeks of my
6 stay there. So I cannot say anything about Sarah.
7 Q. Was there any point in time -- well, let me
8 ask you this way: Did -- you said sometimes you would
9 call the girls to come --
10 A. Uh-huh.
11 Q. -- to give them massage. And sometimes
12 Ms. Maxwell would?
13 A. Yeah.
14 Q. Did there come a time when she took that over
15 entirely from you --
16 A. No.
17 Q. -- or that continued --
18 A. That's continued.
19 Q. -- until you left?
20 A. Yeah.
21 Q. Do you remember, is Jeffrey Epstein godfather
22 to one of the Dubin children?
23 A. I don't know if he godfather. I don't
24 remember that. But he was very fond to these children,
25 the children.

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1 Q. And they called him uncle, you said?
2 A. They called him uncle.
3 Q. Did you ever learn what Tony Santiago did for
4 a living?
5 A. No.
6 Q. Have you had any occasion to see him since the
7 time you left Mr. Epstein's employ?
8 A. No.
9 Q. And you don't -- do you have any idea where he
10 is?
11 A. I have no idea. I remember an incident, one
12 time the -- I went to pick her up at Royal Palm Beach
13 and she was crying and I went and knock at the door and
14 she was crying. And she says, well, -- I think it was
15 Tony or -- because she used to live with these other
16 guys, too. There were two guys and her or two couples.
17 I don't know the arrangements there. But I remember
18 that she told me the -- Tony or her boyfriend had got
19 mad and ripped the furniture, he cut the furniture in
20 pieces and he even broke the screens. Because I was --
21 when I went into to knock the door, the screen was all
22 ripped up like it was cut.
23 And she told me that he got mad at -- I don't
24 know what happened. I never saw him in there.
25 Q. Did she tell you he had hit her or beaten her

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1 at all?
2 MR. CRITTON: Is the she, V., V.R.?
3 MS. EZELL: Yes. Thank you.
4 BY MS. EZELL:
5 Q. Did you ever see during the time you were
6 there photographs of V. in the house, the Epstein house?
7 V.R. in the Epstein house?
8 A. I don't think so. I don't think so.
9 Q. Did you ever see photographs of V.R. in
10 Ms. Maxwell's albums?
11 A. No.
12 Q. At the time you were employed by Mr. Epstein,
13 were there any hidden cameras?
14 A. No.
15 Q. You do know that he installed some after you
16 left, correct?
17 MR. CRITTON: Correct.
18 THE WITNESS: I don't know.
19 BY MS. EZELL:
20 Q. Wasn't there a camera involved in the incident
21 that -- the incident in which you took money from
22 Mr. Epstein?
23 A. Yeah. Yes. But I don't know if he install it
24 or not. That's what he told me.
25 Q. Okay.

1 Q. What kind of costume?
2 A. I don't know. It was a black, shiny costume.
3 I never saw it on her.
4 Q. Was it leather?
5 A. No. I think it was like a vinyl. But we were
6 very fussy about touching any of that stuff. We just...
7 MS. EZELL: No other questions. Thank you,
8 sir.
9 THE WITNESS: You're welcome.
10 MR. LANGINO: I shouldn't have more than a
11 half hour's worth of questions, if everybody is
12 okay to power through.
13 MR. BERGER: I probably have a half hour to an
14 hour.
15 MR. LANGINO: Okay.
16 MR. BERGER: Unless you cover what I cover.
17 MR. MERMELSTEIN: I could say the same thing,
18 so probably less than that.
19 MR. LANGINO: So I guess my question is --
20 MR. BERGER: I think we ought to take a break.
21 MR. LANGINO: That was my question.
22 MR. BERGER: We're going to take a break.
23 Do you have any problem with that?
24 THE WITNESS: No. Whatever you guys want to
25 do.

1 (Lunch recess.)
2 (Continued to Volume II.)
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1 CERTIFICATE OF OATH
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5
6 I, the undersigned authority, certify that
7 JUAN ALESSI personally appeared before me and was duly
8 sworn on the 8th day of September, 2009.
9
10 Dated this 19th day of September, 2009.
11
12
13
14
15 [signature]
Sandra W. Townsend, Court Reporter
16 Notary Public - State of Florida
My Commission Expires: 6/26/12
17 My Commission No.: DD 793913
18
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1 CERTIFICATE
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5 I, Sandra W. Townsend, Court Reporter and
Notary Public in and for the State of Florida at Large,
6 do hereby certify that the aforementioned witness was by
me first duly sworn to testify the whole truth; that I
7 was authorized to and did report said deposition in
stenotype; and that the foregoing pages numbered 1 to
8 78, inclusive, are a true and correct transcription of
my shorthand notes of said deposition.
9
I further certify that said deposition was
10 taken at the time and place hereinabove set forth and
that the taking of said deposition was commenced and
11 completed as hereinabove set out.
12 I further certify that I am not attorney or
counsel of any of the parties, nor am I a relative or
13 employee of any attorney or counsel of party connected
with the action, nor am I financially interested in the
14 action.
15 The foregoing certification of this transcript
does not apply to any reproduction of the same by any
16 means unless under the direct control and/or direction
of the certifying reporter.
17
18
Dated this 19th day of September, 2009.
19
20
[signature]
21
Sandra W. Townsend, Court Reporter
22
23
24
25

1 Q. -- would be the young one?
2 A. Yeah.
3 Q. You stated that Ms. Maxwell was very hard on
4 you and you got blamed for everything, and that you --
5 you liked the job and you liked Mr. Epstein, but you
6 didn't like working for Mrs. Maxwell?
7 A. That's correct.
8 Q. Can you tell me why, other than that she
9 blamed you for everything?
10 A. She came from a very wealthy family and she
11 was -- just my opinion; I give my personal opinion --
12 that she was rotten spoiled and she tried to drive the
13 house like a palace and not a home.
14 I was -- I discussed it with her, many, many
15 times we have discussions. And sometimes I even refuse
16 to do her orders, knowing that I was going to be backed
17 up by Mr. Epstein or do the right thing, my thinking of
18 running the house should be. But we never had a good
19 relationship at all from the beginning, I don't think
20 so. But I was -- have to be her driver and she will go
21 and shop all over the malls and I will have to go behind
22 her, pay for it and bring the bags to the car.
23 Next day or the same day she will do shopping
24 and buy and say, John, go to this store and get it. It
25 was a lot of work. It was a lot that she created and

1 most of this jobs that she created.
2 Q. And one of those things you also had to do
3 with her was to take her to different spas?
4 A. Yes.
5 Q. And there she would recruit young women to
6 come and do massages?
7 A. Because she was English. And she didn't know
8 the area too much as well as I knew. So she -- she
9 says, John, make a list of all the massage -- the spas
10 in the area from Jupiter to Boca Raton. And we went to
11 all the main spas. And then we went to the schools for
12 massage therapists, and all the massage parlors, and
13 massage, the small massage.
14 So I make a list from the telephone book and
15 we would go from one to the another one. I would wait
16 in the car and she goes in.
17 And sometime she took a couple minutes and
18 walk out with cards, business cards. And that -- she
19 did the recruiting.
20 And from then, she pick up the girls and that
21 was the end of it. I never did any recruiting and I
22 never really saw him doing it.
23 Q. You really never saw?
24 A. Never saw Mr. Epstein recruiting anybody.
25 MS. EZELL: All right. I have no other

EXHIBIT 19
(Filed Under Seal)

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL
CIRCUIT IN AND FOR PALM BEACH COUNTY, FLORIDA
CASE NO:502008CA028051XXXXMB AB

L.M.

Plaintiff,

-vs-

JEFFREY EPSTEIN
AND SARAH KELLEN,

Defendants.
_________________________________/

DEPOSITION OF JANUSZ BANASIAK

Tuesday, February 16, 2010
10:09 - 2:30 p.m.

250 Australian Avenue South
Suite 1500
West Palm Beach, Florida 33401

Reported By:
Cynthia Hopkins, RPR, FPR
Notary Public, State of Florida
Prose Court Reporting
Job No.: 1317

1 Q. What family was that?
2 A. It's, it was an older house in New York. I
3 worked there for seven years, no, five years before I
4 get the job in the Seagram company. So, I guess I had
5 some experience to continue.
6 Q. Do you remember the name of the family
7 that you worked with for seven years in New York?
8 A. Frank, Frank.
9 Q. His name is something Frank, F-r-a-n-k?
10 A. Yes.
11 Q. Do you remember the first name?
12 A. Fredrick.
13 Q. And were your duties as house manager for
14 Fredrick Frank similar to your duties as house
15 manager for Jeffrey Epstein?
16 A. Yes, yes.
17 Q. And when you started in 2005 when you
18 heard that there was a job position with Jeffrey
19 Epstein, did you interview for that position?
20 A. Yes.
21 Q. Who did you interview with?
22 A. First I got interviewed with Ghislaine
23 Maxwell.
24 Q. And that's G-h-i-s-l-a-i-n-e, Maxwell?
25 A. Right, right.

1 Q. Where did that interview take place?
2 A. In New York.
3 Q. And it was for the position as house
4 manager in the Palm Beach house, correct?
5 A. Right.
6 Q. That's at 358 Albrillo way?
7 A. Correct.
8 Q. Why were you interviewed in New York, if
9 you know?
10 A. Because at that time I was living in New York
11 with my friends and so --
12 Q. Where did the interview take place in New
13 York?
14 A. In her house on 65th Street.
15 Q. Whose house, do you know?
16 A. Ghislaine Maxwell.
17 Q. So, Ghislaine Maxwell interviewed you back
18 in 2005 at her house in New York for a position at
19 Jeffrey Epstein's house in Palm Beach?
20 A. Right.
21 Q. And what did the interview consist of?
22 What did she ask you?
23 A. She asked me basic questions, you know, what's
24 my previous employer, how long I work for them and
25 basically she was checking my resume.

1 Q. Okay. So, I assume then that your wife
2 that you are separated from I guess at the time, she
3 didn't come down to Palm Beach?
4 A. No, no.
5 Q. And this is somebody who still lives
6 somewhere other than Florida?
7 A. Correct.
8 Q. So, you came down in February 2005 and
9 began working. What did you, what did you first
10 start doing for Jeffrey Epstein?
11 A. First I doing? I don't remember nothing
12 special.
13 Q. Okay. Well, were you working -- I will
14 rephrase it. Were you working only for Jeffrey
15 Epstein or were you working also for Ghislaine
16 Maxwell, the other person who interviewed you, or
17 anybody else in the house?
18 A. I guess only for him because she was visiting
19 a few times house, but I am employed by him.
20 Q. Okay. What was your understanding at that
21 time as to the relationship between Ghislaine
22 Maxwell and Jeffrey Epstein?
23 A. They were like partners in business.
24 Q. Okay. What business was that, if you
25 know?

1 A. I don't know what kind of business but she was
2 the one who organized I would say employment with this
3 organization. So, whatever I need, if I have some kind
4 of problem, I contact her. She was the one who decided
5 what I have to answer my problems with, what I was
6 supposed to do.
7 Q. How many times did you have problems where
8 you had to go through her?
9 A. Well, not big problems. Just a question of
10 what certain, how to do certain things. For example,
11 what kind of flowers I have to buy, what kind of things
12 he likes, what time I supposed to serve him coffee in
13 the mornings, sort of organizing things.
14 Q. Those are things that you wouldn't ask
15 Jeffrey Epstein directly?
16 A. No, no. He doesn't like those things to ask
17 him directly. He would like to prefer either through
18 his assistant or like I say, Ghislaine Maxwell.
19 Q. Is that still the same today?
20 A. Yes, still the same. Unless, something happen
21 that I need to, nobody is around and I need to urgently
22 contact him, I go to him directly.
23 Q. So, for the most part if you have a
24 question or at least -- let's go back to 2005, you
25 had a question about what needed to be done in the

1 A. (Witness shakes head.)
2 Q. And I'm sorry.
3 A. No.
4 Q. I understood you when you shook your head.
5 A. I realize what you told me but I am sorry.
6 Q. I told you it was easy to forget.
7 Do you remember who it was that personally
8 removed the computers and equipment from the
9 property? Was it Mr. Epstein, was it a lawyer, was
10 it, do you remember?
11 A. It was Adriana.
12 Q. All right. And I am of the understanding
13 that there were several computers that were removed
14 from the house, correct?
15 MR. GOLDBERGER: Form.
16 THE WITNESS: Yes, three of them.
17 BY MR. EDWARDS:
18 Q. Three? And to your knowledge Adriana
19 removed all of them?
20 A. She show up one day with gentleman. I don't
21 remember his name. And she told me that they are moving
22 out those computers.
23 Q. And where were the computers? Which rooms
24 were the computers in that were removed by Adriana
25 and this gentleman you're describing?

1 CERTIFICATE OF OATH
2 THE STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5
6 I, the undersigned authority, certify that
7 JANUSZ BANASIAK personally appeared before me
8 and was duly sworn on the 16th day of February,
9 2010.
10
11 Dated this 28th day of February, 2010.
12
13
14
15
16
Cynthia Hopkins, RPR, FPR
17 Notary Public - State of Florida
My Commission Expires: February 25, 2011
18 My Commission No.: DD 643788
19
20
21
22
23
24
25

1 C E R T I F I C A T E

2 THE STATE OF FLORIDA

3 COUNTY OF PALM BEACH

4

5 I, Cynthia Hopkins, Registered Professional Reporter, Florida Professional Reporter and Notary
6 Public in and for the State of Florida at large, do hereby certify that I was authorized to and did
7 report said deposition in stenotype; and that the foregoing pages are a true and correct transcription
8 of my shorthand notes of said deposition.

9 I further certify that said deposition was taken at the time and place hereinabove set forth
10 and that the taking of said deposition was commenced and completed as hereinabove set out.

11

I further certify that I am not attorney or
12 counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party
13 connected with the action, nor am I financially interested in the action.

14

The foregoing certification of this transcript
15 does not apply to any reproduction of the same by any means unless under the direct control and/or
16 direction of the certifying reporter.

17 Dated this 28th day of February, 2010.

18

19

20

21 Cynthia J. Hopkins
Cynthia Hopkins, RPR, FPR

22

23

24

25

EXHIBIT 20
(Filed Under Seal)

09 - 22783

Condensed Transcript

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION

L.M.,

Plaintiff,

vs.

CASE No.
502008CA028051XXXXMB AB

JEFFREY EPSTEIN,

Defendant.

~~~~~~~~~~~~~~~~~~~~~~~~

DEPOSITION OF

LOUELLA RABUYO

VOLUME I

October, 20, 2009
10:10 a.m.

515 N. Flagler Drive
Suite 200-P
West Palm Beach, Florida 33401

Reported By: Teresa Whalen, RPR, FPR, Notary Public, State of Florida

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4440 PGA Boulevard
Palm Beach Gardens, FL 33410
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~~~~~~~~~~~~~~~~~~~~~~~~

1

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT
IN AND FOR PALM BEACH COUNTY, FLORIDA
CIVIL DIVISION
CASE No.502008CA028051XXXXMB AB

L.M.,
Plaintiff,
-vs-
JEFFREY EPSTEIN,
Defendant.

DEPOSITION OF LOUELLA RABUYO
VOLUME I

Tuesday, October, 20, 2009
10:10 - 3:30 p.m.

515 N. Flagler Drive, Suite 200-P
West Palm Beach, Florida 33401

Reported By:
Teresa Whalen, RPR, FPR
Notary Public, State of Florida
West Palm Beach Office Job #118991

2

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
2
CASE No.08-CV-80119-CIV-MARRA/JOHNSON
3
4 JANE DOE NO. 2,
5
Plaintiff,
6 -vs-
7 JEFFREY EPSTEIN,
8 Defendant.
_______________/
9 Related cases:
08-80232, 08-80380, 98-80381, 08-80994,
10 08-80993, 08-80811, 08-80893, 09-80469,
09-80591, 09-80656, 09-80802, 09-81092
11 _______________/
12
DEPOSITION OF LOUELLA RABUYO
13 VOLUME I
14
Tuesday, October 20, 2009
15 10:10 - 3:30 p.m.
16
515 N. Flagler Drive, Suite 200-P
17
West Palm Beach, Florida 33401
18
19
20
21 Reported By:
Teresa Whalen, RPR, FPR
22 Notary Public, State of Florida
West Palm Beach Office Job #118991
23 Phone: 800.330.6952
561.659.4155
24
25

3

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CARA L. HOLMES, ESQUIRE
9 ROTHSTEIN ROSENFELDT ADLER
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20 Phone: 305.931.2200
21 On behalf of Plaintiff in related Case No. 08-80811
22 JACK HILL, ESQUIRE (Partially via speakerphone)
SEARCY, DENNEY, SCAROLA, BARNHART & SHIPLEY
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24 Phone: 561.686.6300
25

4

1 - - -
2 I N D E X
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12
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14 E X H I B I T S
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81

1 A When I came back to report, that's how I
2 learned.
3 Q Elaborate on that for me. What do you mean,
4 when you came back to report that's how I learned?
5 A I reported in the afternoon, and then that's
6 how I learned that the police came.
7 Q All right. And when were you -- you're now
8 saying you came back to report and you learned that the
9 police had already come to the house, right?
10 A Yes, sir.
11 Q Prior to that occasion, when was the previous
12 time that you were at the house?
13 A The day before.
14 Q Okay. And the day before you left your shift
15 at roughly five o'clock?
16 A I cannot remember. I usually leave 5:00 or
17 5:30.
18 Q But sometime late in the afternoon?
19 A Yes.
20 Q And as of that time, the day before the search
21 warrant was issued, you had seen no police officers in
22 or around the house?
23 A No.
24 Q And then the next day you reported to the job
25 at what time?

82

1 A The next day?
2 Q The next day.
3 A I report in the afternoon.
4 Q Was there a reason why you reported in the
5 afternoon?
6 A Ms. Maxwell called me.
7 Q When did she call you?
8 A During that day, she said Louella, you can
9 report in the afternoon.
10 Q She called you early in the morning?
11 A Not early.
12 Q Normally you would report to the house between
13 eight and nine o'clock, right?
14 A Yes, sir.
15 Q So in order for you not to arrive at the
16 house, she had to have called you before eight or
17 nine o'clock, right?
18 A Yes.
19 Q Okay. So approximately what time does
20 Ms. Maxwell call you to tell you you can report to the
21 house later on that day?
22 A I cannot remember really the time.
23 Q Okay. What time did you actually report to
24 the house?
25 A After lunch, about -- maybe after lunch.

83

1 Q So are we talking about the day the police
2 went to Jeffrey Epstein's house you did not go in the
3 morning, but you went after lunch and the police had
4 already left?
5 A Oh. No. When I went there nobody was there,
6 no policemen were around.
7 Q Who was at the house then?
8 A Janusz, and Douglas, the architect.
9 Q Schoettle?
10 A Yes.
11 Q And did you have a discussion with them?
12 A No.
13 Q How did you know the police had been to the
14 house?
15 A Janusz told me.
16 Q When?
17 A When I arrive.
18 Q That's what I was asking you when I said did
19 you have a discussion with them, meaning Janusz and
20 Douglas.
21 A Okay. Being because them -- with Janusz only.
22 Q What did he say?
23 A He said the police came and, what's this, took
24 away some stuff.
25 Q Did he say what they took?

84

1 A He said pictures.
2 Q Did he tell you which pictures?
3 A No, sir.
4 Q Aside from pictures, what else did the police
5 take, as Janusz told you?
6 A He did not elaborate.
7 Q All right. Prior to the police going to the
8 house and taking pictures, do you remember seeing
9 pictures around Mr. Epstein's house?
10 A Yes.
11 Q Do you remember seeing pictures of naked or
12 nude females around Mr. Epstein's house?
13 A Not around, in his closet.
14 Q In Mr. Epstein's closet you would see --
15 describe what you would see related to females in
16 pictures.
17 A Some have topless.
18 Q Is this a big closet?
19 A No. Not really big, it's just this big, not
20 so big.
21 Q Okay. Were these pictures that could be seen
22 by -- strike that.
23 Do you know of any other pictures of females
24 that were confiscated by the police that did not come
25 from Mr. Epstein's closet?

129

1 STATE OF FLORIDA
2 COUNTY OF PALM BEACH
3
4
5 I, the undersigned authority, certify that
6 LOUELLA RABUYO personally appeared before me on the 20th
7 of October, 2009, and was duly sworn.
8
9 Dated this 30th day of October, 2009.
10
11
12
13
14 ______________________________
Teresa Whalen, RPR, FPR
15 Notary Public - State of Florida
My Commission Expires: 4/25/11
16 My Commission No.: DD 644533
17 Job # 118991
18
19
20
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22
23
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130

1 CERTIFICATE
2 STATE OF FLORIDA
3 COUNTY OF PALM BEACH
4
5 I, Teresa Whalen, Registered Professional Reporter and Notary Public in and for the State of
6 Florida at Large, do hereby certify that the aforementioned witness was by me first duly sworn to
7 testify the whole truth; that I was authorized to and did report said deposition in stenotype; and
8 that the foregoing pages are a true and correct transcription of my shorthand notes of said
9 deposition.
10 I further certify that said deposition was taken at the time and place hereinabove set forth
11 and that the taking of said deposition was commenced and completed as hereinabove set out.
12
I further certify that I am not attorney or
13 counsel of any of the parties, nor am I a relative or employee of any attorney or counsel of party connected
14 with the action, nor am I financially interested in the action.
15
The foregoing certification of this transcript
16 does not apply to any reproduction of the same by any means unless under the direct control and/or direction
17 of the certifying reporter.
18
19 Dated this 30th day of October, 2009.
20
21 ______________________________
22 Teresa Whalen, RPR, FPR
23 Job # 118991
24
25

EXHIBIT 21
(Filed Under Seal)

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
2
3 JANE DOE NO. 2, Case No: 08-CV-80119
4 Plaintiff,
5 Vs
6 JEFFREY EPSTEIN,
7 Defendant.
_______________________/
8
JANE DOE NO. 3, Case NO: 08-CV-80232
9
Plaintiff,
10 Vs
11 JEFFREY EPSTEIN,
12 Defendant.
_______________________/
13
JANE DOE NO. 4, Case No: 08-CV-80380
14
Plaintiff,
15
Vs.
16
JEFFREY EPSTEIN,
17
Defendant.
18 _______________________/
19 JANE DOE NO. 5, Case No: 08-CV-80381
20 Plaintiff,
21 Vs
22 JEFFREY EPSTEIN,
23 Defendant.
_______________________/
24
25

Page 2

1 JANE DOE NO. 6, Case No: 08-CV-80994
2 Plaintiff,
3 Vs
4 JEFFREY EPSTEIN,
5 Defendant.
______________________/
6
JANE DOE NO. 7, Case No. 08-CV-80993
7
Plaintiff,
8
Vs
9
JEFFREY EPSTEIN,
10
Defendant.
11 ______________________/
12 C.M.A., Case No: 08-CV-80811
13 Plaintiff,
14 Vs
15 JEFFREY EPSTEIN,
16 Defendant.
______________________/
17
JANE DOE, Case No: 08-CV-80893
18
Plaintiff,
19
Vs
20
JEFFREY EPSTEIN,
21
Defendant.
22 ______________________/
23
24
25

Page 3

1 JANE DOE NO. II, Case No: 08-CV-80469
2 Plaintiff,
3 Vs
4 JEFFREY EPSTEIN,
5 Defendant.
______________________/
6
JANE DOE NO. 101, Case No: 09-CV-80591
7
Plaintiff,
8
Vs
9
JEFFREY EPSTEIN,
10
Defendant.
11 ______________________/
12 JANE DOE NO. 102, Case No: 09-CV-80656
13 Plaintiff,
14 Vs
15 JEFFREY EPSTEIN,
16 Defendant.
______________________/
17
18
19
20 1031 Ives Dairy Road
Suite 228
21 North Miami, Florida
July 29, 2009
22 11:00 a.m. to 5:30 p.m.
23
24
25

Page 4

1 V I D E O T A P E D
2 D E P O S I T I O N
3 of
4 ALFREDO RODRIGUEZ
5
6 taken on behalf of the Plaintiffs pursuant
7 to a Re-Notice of Taking Deposition (Duces Tecum)
8
9 - - -
10 APPEARANCES:
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Miami, Florida 33160
14 Attorney for Jane Doe 2, 3, 4, 5,
6, and 7.
15
16 ROTHSTEIN ROSENFELDT ADLER
BY: BRAD J. EDWARDS, ESQ., and
17 CARA HOLMES, ESQ.
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Attorney for Jane Doe and E.W.
20 And L.M.
21
PODHURST ORSECK
22 BY: KATHERINE W. EZELL
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Page 5

1
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11 COLEMAN, LLP
BY: ROBERT CRITTON, ESQ.
12 515 North Flagler Drive
Suite 400
13 West Palm Beach, Florida 33401
Attorney for Jeffrey Epstein.
14
15
16
ALSO PRESENT:
17
JOE LANGSAM, VIDEOGRAPHER
18
19
- - -
20
21
22
23
24
25

Page 6

1 INDEX OF EXAMINATION
2

WITNESS	DIRECT	CROSS
3 ALFREDO RODRIGUEZ		
4 (By Mr. Mermelstein)	12	
5 (By Mr. Edwards)	157	
6 (By Mr. Langino)	260	

7
8
9
10 INDEX OF EXHIBITS

11 EXHIBITS	PAGE
12 1 Message pad	72
13 2 Documents	115

14
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Page 7

1 Deposition taken before MICHELLE PAYNE, Court
2 Reporter and Notary Public in and for the State of
3 Florida at Large, in the above cause.
4 - - -
5 THE VIDEOGRAPHER: This is the case of
6 Jane Doe No. 2, plaintiff, versus Jeffrey
7 Epstein, defendant. Jane Doe No. 3,
8 plaintiff, versus Jeffrey Epstein,
9 defendant. Jane Doe No. 4, plaintiff,
10 versus Jeffrey Epstein, defendant. And Jane
11 Doe No. 5, plaintiff, versus Jeffrey
12 Epstein, defendant. Jane Doe No. 6,
13 plaintiff, versus Jeffrey Epstein,
14 defendant. Jane Doe No. 7, plaintiff,
15 versus Jeffrey Epstein, defendant. CMA,
16 plaintiff, versus Jeffrey Epstein,
17 defendant. And Jane Doe, plaintiff, versus
18 Jeffrey Epstein, et al, defendant. And Jane
19 Doe -- is there a shorter thing that we can
20 do here? It's also missing this one right
21 here.
22 MR. MERMELSTEIN: Do we have a problem
23 with saying Jane Doe 2 and the Epstein and
24 related cases?
25 THE VIDEOGRAPHER: I'm missing this Jane

Page 8

1 Doe right here on the copy you gave me. I'm
2 missing which Jane Doe this is.
3 They're all different case numbers. Do
4 you want me to go through each case number?
5 MR. CRITTON: I'm going to note my
6 objection. Obviously if this deposition
7 gets played -- not obviously, I'm going to
8 object to the litany of each one so I don't
9 know how we can separate it out. Maybe if
10 and when at the time of trial and depending
11 on how the Court determines what comes in
12 and what doesn't with regard to the
13 consolidated aspects of this. I have no
14 great idea other than just saying Jane Doe
15 versus Epstein, et al, or something like
16 that, or Jane Doe, et al.
17 MS. EZELL: Couldn't we just say and
18 those cases which have been consolidated
19 with it for Discovery purposes?
20 MR. EDWARDS: Although there is cases
21 here that have cross noticed this from state
22 court that haven't been consolidated so that
23 may not work. You may have to read them
24 all, if it works out your way that will just
25 get edited out, at least he will have read

Page 9

1 that caption, every caption. Right? Is
2 there a better suggestion?
3 MR. CRITTON: No. There may be a better
4 suggestion if he starts this is such and
5 such day, it's the deposition of Mr.
6 Rodriguez in the case such and such, and we
7 can almost fill it in depending on which
8 tape it goes, how it fills in, at least
9 we'll have the context of the first and
10 depending on whether the Judge reads it in
11 from a consolidated or they all come
12 related, I have no great idea.
13 MR. EDWARDS: I was thinking if he read
14 every one of them and it was the seventh in
15 line then you just would edit it so you
16 would only read that one.
17 MR. CRITTON: I'm okay with that too.
18 THE VIDEOGRAPHER: On page number three
19 there is something missing on the top here.
20 Do you want me to read each case number
21 separately?
22 MR. MERMELSTEIN: I don't think it's
23 necessary.
24 MR. EDWARDS: I don't think it's
25 necessary either.

Page 26

1 with a copy.
2 Q. Were you the only one who was allowed to
3 answer the phone?
4 A. Yes.
5 Q. I'm sorry, what would you do --
6 A. I would leave it on the counter next to
7 the kitchen so when I find that piece all crumbled
8 I knew that Mr. Epstein saw the message, so we
9 communicated like that.
10 Q. Now, you mentioned Mr. Epstein would give
11 you instructions during the course of the day.
12 A. Through his assistant.
13 Q. And his assistant was whom?
14 A. Sarah Kellen.
15 Q. But you didn't view her as your
16 supervisor?
17 A. She take orders from Mrs. Maxwell but she
18 will tell me, Alfredo, we need to buy this, we
19 need to do this, and so and so was coming. I
20 couldn't talk directly to Mr. Epstein.
21 Q. Okay. So any communications from Mr.
22 Epstein always came through Ms. Kellen?
23 A. Or from the office in New York. Lesley,
24 his secretary, or somebody else, the comptroller,
25 the architect, any lawyer.

Page 27

1 Q. Lawyer, what kind of instructions would
2 you get from lawyers?
3 A. We used to have a lot of time, for
4 instance, the dock construction, you need to have
5 a lot of permits in Palm Beach so they were there
6 for that reason.
7 Q. Okay. Now, so you would interact with
8 the staff from New York and that would include I
9 think you said Lesley?
10 A. Lesley, Bella.
11 Q. What was Lesley's position?
12 A. Lesley is the secretary, secretary to Mr.
13 Epstein.
14 Q. Okay. Is that Lesley Groff?
15 A. I believe it was, I don't remember the
16 last name.
17 Q. Bella, who was Bella?
18 A. Bella was the assistant comptroller.
19 Q. Anyone else that you dealt with in New
20 York?
21 A. Doug Shadow was the architect and he used
22 to come to the house in a regular basis because we
23 used to have a lot of projects going on.
24 Q. Okay. Would you get advance notice when
25 Mr. Epstein was going to arrive in Palm Beach?

Page 28

1 A. Yes. Sometimes very short notice but,
2 yes, I was.
3 Q. So that varied?
4 A. Yes.
5 Q. Who would give you that notice?
6 A. Mrs. Maxwell or Sarah or Larry, the
7 pilot.
8 Q. And then you would drive to pick them up
9 at the airport?
10 A. Yes.
11 Q. And who traveled with him?
12 A. The three pilots and some guests.
13 Q. What do you mean by guests?
14 A. He will have some friends from Harvard,
15 he will have -- well, very important people that,
16 you know, friends, acquaintances from New York or
17 Europe because I was just told the number of
18 people was coming on the plane.
19 Q. Were there people who were employed by
20 him who came regularly?
21 A. Yes.
22 Q. And who would they be?
23 A. Like I said, they were the pilots, Larry
24 Bisosky, George, and I don't remember the flight
25 engineer, and he will have two girlfriends.

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1 Q. The pilot would have two girlfriends?
2 A. Mr. Epstein. This is all people coming
3 in the plane together.
4 Q. Right. What do you mean by girlfriends?
5 A. Friends, you know, that he was always
6 having friends that he will befriend in New York,
7 I don't know, or some other places.
8 But I was just told -- my concern was how
9 many people I have to feed, how many cars do I
10 need to transport these people from the airport to
11 the house, and to arrange accommodations in the
12 house.
13 Q. What about Sarah Kellen, did she travel
14 with him?
15 A. Yes.
16 Q. So she was on the plane?
17 A. Yes.
18 MR. CRITTON: Form.
19 BY MR. MERMELSTEIN:
20 Q. And Ms. Maxwell?
21 MR. CRITTON: Form.
22 THE WITNESS: No, she will have different
23 plane.
24 BY MR. MERMELSTEIN:
25 Q. Okay.

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1 in cash as opposed to check?
2 MR. CRITTON: Form.
3 THE WITNESS: I was told to pay them
4 cash, sir.
5 BY MR. MERMELSTEIN:
6 Q. Simply you were told and didn't ask why?
7 A. No.
8 Q. Do you recall telling the detective who
9 interviewed you for the police that you thought of
10 yourself as a human ATM machine?
11 MR. CRITTON: Form.
12 THE WITNESS: Yes.
13 BY MR. MERMELSTEIN:
14 Q. You recall saying that?
15 MR. CRITTON: Form.
16 THE WITNESS: Because I always had cash
17 in my pocket.
18 BY MR. MERMELSTEIN:
19 Q. And why was there always cash in your
20 pocket?
21 A. That was part of my job to have, you
22 know, for emergencies or paying somebody cash.
23 Q. Okay. What kind of emergencies?
24 A. It's hard to say. I was supposed to put
25 cash on each Mercedes Benz on each ashtray. The

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1 idea behind this is you get stranded nobody accept
2 credit card or check you have cash.
3 Q. How much did you leave in the ashtray?
4 A. 300.
5 Q. And did you ever have to replenish that
6 money?
7 A. Yes.
8 Q. Because the Mercedes was stranded?
9 A. No, because when Mr. Epstein will leave I
10 have to collect that money because I will send the
11 cars to the car wash so to avoid that money being
12 stolen we used to keep track, you know, when to
13 retrieve that money and then when he's coming put
14 it back there again.
15 Q. So you use cash for that purpose and you
16 also use cash to pay the masseuses. Correct?
17 A. Yes.
18 Q. Did you use cash for any other purpose?
19 A. Car wash for the guy who used to came to
20 the house and wash all the cars. Tipping
21 sometimes for getting a good spot in the
22 restaurant you have to have cash, something like
23 that.
24 Q. Okay. Would you drive Mr. Epstein to a
25 restaurant?

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1 A. Not him. I will drive anybody else but
2 he would rather eat at home.
3 Q. So you would drive house guests to
4 restaurants?
5 A. Yes.
6 Q. And when you did that you would -- didn't
7 you stay with the car or did you eat with them?
8 A. No, I will stay with the car.
9 Q. So who did you tip?
10 A. If you want to park in front of the
11 restaurant you got to tip the valet otherwise
12 you're taking one of the spots.
13 Sometimes I used to take -- I'm sorry.
14 Aviation, you know, you need to go to aviation and
15 help those guys move your cars around, you need --
16 they carry luggage, so I used to tip those too.
17 Q. That would be when you picked up or
18 dropped off Mr. Epstein. Correct?
19 A. Yes.
20 MR. MERMELSTEIN: We'll mark this as an
21 exhibit, composite exhibit.
22 (Composite Exhibit 1 was marked for
23 Identification.)
24 MR. CRITTON: Just out of curiosity, on
25 depositions are we going to use instead of

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1 doing plaintiff and defendant designations
2 do you just want to run them one, two,
3 three, four?
4 MR. MERMELSTEIN: That's fine with me as
5 long as we remember where we left off.
6 MR. CRITTON: Well, are we going to do it
7 consecutive with all of the depositions?
8 I'm okay with that if someone can keep track
9 of that.
10 MR. EDWARDS: I've had that go wrong
11 before, especially when we have some parties
12 who aren't here, such as Mr. Garcia, he's
13 going to join depositions, we have to start
14 at 27 or whatever.
15 MR. CRITTON: For each deposition one
16 through whatever without necessarily giving
17 them a plaintiff or defendant.
18 BY MR. MERMELSTEIN:
19 Q. Mr. Rodriguez, I've marked as Exhibit 1 a
20 composite document which includes four per page of
21 what appear to be message slips.
22 First of all let me ask you, let me
23 direct your attention to the first page of this
24 exhibit. And the upper left message has initials
25 at the bottom. Is that correct?

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1 A. Yes.
2 Q. Are those your initials?
3 A. Yes.
4 Q. And was it the household policy to
5 initial messages when they were taken?
6 A. Yes.
7 Q. Okay. You were instructed to do that?
8 A. Yes.
9 Q. Who instructed you to do that?
10 A. Ms. Maxwell. There was a manual, sir, in
11 the house, we had to follow the instructions of
12 the manual.
13 Q. There was -- okay.
14 A. Estate manager, household manager for all
15 the houses, so I will abide to that, you know, so
16 I take message with my initial, the time, who
17 called.
18 Q. So there were all sorts of policies and
19 procedures in this manual?
20 A. Yes.
21 Q. Who wrote it?
22 A. It was the estate manager for all the
23 properties and so I was --
24 Q. Who was the estate manager for all the
25 properties?

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1 A. I never met him, sir, he was fired before
2 I came along.
3 Q. But you don't remember his name?
4 A. No, sir.
5 Q. And you remember one of the things that
6 said in this manual was that every message has to
7 be signed?
8 A. Yes.
9 Q. I'm not necessarily going to go through
10 every single message. Let me go back to the one
11 on the upper left on the first page. It's from
12 Jean-Luc. Is that correct?
13 A. Yes, sir.
14 Q. Who is Jean-Luc?
15 A. He had modeling agency.
16 Q. How do you know that?
17 A. He gave me his card, sir.
18 Q. Was he a frequent guest at the house?
19 A. Yes, sir.
20 Q. Did he stay over?
21 A. Sometimes he will stay, sometimes I will
22 drive him to Miami.
23 Q. Do you recall his last name?
24 A. No, sir.
25 Q. And so you had a conversation with him

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1 and he told you he owned a modeling agency?
2 A. Yes, sir.
3 Q. Anything else he told you?
4 A. He spoke, you know, five, six languages,
5 always speaking Spanish, Italian.
6 Q. Did the girls who were -- you know, who
7 travelled with Mr. Epstein, were they from his
8 agency?
9 MR. CRITTON: Form.
10 THE WITNESS: I don't know, sir.
11 BY MR. MERMELSTEIN:
12 Q. You didn't discuss that?
13 A. No.
14 Q. Let's look at the message next to it.
15 MR. CRITTON: Still on page one?
16 MR. MERMELSTEIN: Still on page one.
17 BY MR. MERMELSTEIN:
18 Q. It appears the one under it is to the
19 same person. Is that correct? Who is that?
20 A. Alicia.
21 Q. Who is Alicia?
22 A. I don't know, sir. Please tell Jeffrey
23 that I called so I just wrote the name.
24 Q. Now, some of these messages if you look
25 through appears to be a different handwriting and

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1 there is no signature on the bottom.
2 A. That's not mine, I don't know who's that
3 is, sir.
4 Q. I thought you said earlier you were the
5 one who was responsible for taking messages.
6 A. Exactly, yes, I was, sir.
7 Q. But there were other people who took
8 messages as well?
9 A. Maybe this is after or before my time,
10 sir.
11 Q. Okay. Because there is no date on it.
12 A. I used to put my dates and I know I used
13 to do that all the time, but you know.
14 Q. These style of message pads. It was a
15 pad. Correct?
16 A. Yes.
17 Q. And this is the old fashion message pad
18 that it's like duplicate?
19 A. Exactly, the original stays with the
20 spiral.
21 Q. Okay. So there was a spiral notebook?
22 A. Exactly.
23 Q. And you would write the message on the
24 top copy and then you would take that out and put
25 it on the counter in the kitchen?

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1 Q. You had a laptop?
2 A. No, it was desktop.
3 Q. Okay. So you had your own desktop in the
4 staff house?
5 A. Yeah. Exactly.
6 Q. And you don't know what was -- what was
7 the files in that computer versus on the other
8 computers?
9 A. No, sir.
10 Q. Did you ever see any pornography on any
11 of the computers?
12 A. No, sir.
13 Q. Are you sure about that?
14 A. Pornography as in sexual acts, no.
15 Q. Pornography as in naked people, men or
16 women.
17 A. Yeah, there were some.
18 Q. Okay. And describe to me what that was.
19 A. They were like models.
20 Q. And where were those in the computer? I
21 mean, how did you access that?
22 A. They were in the files and some of it
23 in -- you mean which file they were, what was your
24 question?
25 Q. Where were they in the computer? There

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1 were downloaded files on computer?
2 A. They were downloaded, yes.
3 MR. CRITTON: Form.
4 BY MR. MERMELSTEIN:
5 Q. Okay. There were photographs of naked
6 women?
7 A. Models.
8 Q. And why do you say models?
9 A. Because it was like a catalog so you have
10 models, you know.
11 Q. And what was your understanding as a
12 source of these photos?
13 A. I don't know, sir. It was just a
14 curiosity on myself and it was -- it was none of
15 my business but, you know, I just happen to see
16 them there.
17 Q. Did these girls appear very young to you?
18 MR. CRITTON: Form.
19 THE WITNESS: No, sir. They were young
20 but not underage.
21 BY MR. MERMELSTEIN:
22 Q. Is there anything in particular that
23 makes you draw that conclusion?
24 A. Because they are developed, you know.
25 It's hard to say, sir, you know.

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1 Q. The girls who came to the house for
2 massages, did you ever call a cab to bring any of
3 the girls home?
4 A. Probably on a few occasions.
5 Q. So is it your understanding that they
6 would have arrived by cab as well?
7 MR. CRITTON: Form.
8 THE WITNESS: Yes.
9 BY MR. MERMELSTEIN:
10 Q. And how would that come about, were you
11 given instructions to call a cab by anyone?
12 A. No, I would call the cab, the taxi.
13 Q. How did you know a cab needed to be
14 called?
15 A. Because Sarah would tell me can you get
16 me a taxi.
17 Q. So when the girl was finished what she
18 was doing Sarah would come to you and say --
19 A. She would call me.
20 MR. CRITTON: Form.
21 BY MR. MERMELSTEIN:
22 Q. She would call you?
23 A. Yes.
24 Q. Okay. You would be in the guest house at
25 the time?

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1 A. Yes.
2 Q. Do you recall having to do that often?
3 A. No, not very often, sir.
4 Q. Did Mr. Epstein keep photograph equipment
5 in the house?
6 A. I don't remember seeing it.
7 Q. Do you recall seeing any video equipment?
8 A. No, sir.
9 Q. Do you recall any video or photograph
10 equipment in the master bedroom?
11 A. No, sir.
12 Q. The models that you saw on the computer,
13 did you recognize any of them as having been at
14 the house?
15 A. No.
16 Q. The girls who stayed at the house, did
17 any of them speak with a foreign accent?
18 A. Yes.
19 Q. Many of them?
20 MR. CRITTON: Form.
21 THE WITNESS: Some of them.
22 BY MR. MERMELSTEIN:
23 Q. Would any of them not speak any English?
24 A. No.
25 Q. They all spoke English?

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1 written down anywhere?
2 A. No.
3 Q. It's my understanding that C. and T.
4 either came to his house alone to visit with Mr.
5 Epstein or brought other girls in their age group
6 to Mr. Epstein.
7 Were you familiar with that type of
8 recruitment process of girls bringing other girls?
9 MR. CRITTON: Form.
10 THE WITNESS: Yes.
11 BY MR. EDWARDS:
12 Q. Can you tell me more about what you know
13 about girls bringing other girls that are
14 relatively the same age to come to Jeffrey
15 Epstein's house and to use your words, have a good
16 time?
17 MR. CRITTON: Form.
18 THE WITNESS: It's hard to know who they
19 knew. But I think that was -- they feel
20 better themselves when they're in a group
21 than going by themselves, but I don't know
22 somebody recruiting.
23 BY MR. EDWARDS:
24 Q. Okay. And you've talked about, at least
25 referred to yourself I believe to the police and

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1 as well today as a human ATM machine. Right?
2 MR. CRITTON: Form.
3 THE WITNESS: Something like that. I was
4 supposed to carry cash at all times.
5 BY MR. EDWARDS:
6 Q. One of the primary reasons why you
7 carried cash was to pay the girls in this age
8 group of C. and T. for whatever happened at the
9 house. Right?
10 MR. CRITTON: Form.
11 THE WITNESS: Yes.
12 BY MR. EDWARDS:
13 Q. That's a fair statement. Right?
14 MR. CRITTON: Form.
15 THE WITNESS: Yes.
16 BY MR. EDWARDS:
17 Q. Okay. And when C., let's use her for
18 example, would bring somebody else to the house,
19 did you pay C. as well as whomever she brought to
20 the house, pay them both?
21 A. No, I pay only one person.
22 Q. Okay. My understanding, and tell me if
23 this is wrong or you can corroborate this, is that
24 Mr. Epstein would pay the girl that was actually
25 performing whatever was happening in the room --

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1 for now we'll call it a massage -- as well as
2 anybody who brought that person over to the house,
3 they would both get paid cash. Are you familiar
4 with that?
5 MR. CRITTON: Form.
6 THE WITNESS: No.
7 BY MR. EDWARDS:
8 Q. If C. brought another girl over to the
9 house and C. stayed downstairs but this other girl
10 went upstairs with Mr. Epstein, which one would
11 you pay?
12 A. I don't know because I was told who to
13 pay.
14 Q. And Sarah Kellen always told you?
15 A. Sarah told me pay so and so.
16 Q. So if we were going to ask anybody else
17 about the exact method in terms of who would get
18 paid and for what, who would the people be? I
19 mean, other than Mr. Epstein who else could we ask
20 these questions?
21 A. Sarah.
22 Q. Sarah Kellen?
23 A. Yes.
24 Q. She would know this?
25 A. Yes.

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1 Q. What about Ghislaine Maxwell?
2 MR. CRITTON: Form.
3 THE WITNESS: You're talking about the
4 boss. I don't know.
5 BY MR. EDWARDS:
6 Q. To your knowledge was Ghislaine Maxwell
7 aware of these girls that are in the age group of
8 C. and T. coming to Jeffrey Epstein's house to
9 have a good time?
10 MR. CRITTON: Form.
11 THE WITNESS: I have to say something.
12 Mrs. Maxwell called me and told me not to
13 ever discuss or contact her again in a
14 threaten way.
15 BY MR. EDWARDS:
16 Q. When was this?
17 A. Right after I left because I call one of
18 the friends for a job and she told me this, but,
19 you know, I feel intimidated and so I want to keep
20 her out.
21 Q. What exactly did she say? First of all,
22 was this a telephone call?
23 A. Yes, she was in New York.
24 Q. She called you on your cell phone?
25 A. Yes.

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1 Cab Company?
2 A. West Palm Beach Taxi. No, it's not
3 Yellow. Could be Yellow, but I don't know.
4 Q. Would Mr. Epstein have the names or the
5 list?
6 A. Probably.
7 MR. CRITTON: Form.
8 BY MR. EDWARDS:
9 Q. Anybody else?
10 A. Sarah.
11 Q. Sarah would have?
12 A. Yes.
13 Q. In addition to Mr. Epstein obviously
14 knowing who's coming to and from the house, would
15 Sarah also be familiar with the names of the girls
16 and who they were?
17 A. Yes.
18 Q. In addition to Sarah and Mr. Epstein
19 would Ghislaine Maxwell be familiar with the names
20 of some of these girls?
21 MR. CRITTON: Form.
22 THE WITNESS: Yes.
23 BY MR. EDWARDS:
24 Q. Are these names kept in a database in a
25 computer system?

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1 A. Could be.
2 MR. CRITTON: I'm sorry, did you say
3 could be?
4 THE WITNESS: Yeah.
5 MR. CRITTON: Move to strike as
6 speculation.
7 BY MR. EDWARDS:
8 Q. When you say could be, why do you say
9 that?
10 A. Because there were too many and they were
11 very organized and there is nothing you write on a
12 piece of paper.
13 Q. When you say they were very organized,
14 are we talking --
15 A. Mr. Epstein and Sarah.
16 Q. Anybody else beside Mr. Epstein and
17 Sarah, I guess beside Sarah that would do the
18 scheduling to coordinate the times these girls
19 would come to the house?
20 A. I'm sorry, anybody else you say?
21 Q. Right, aside from Sarah.
22 A. No, no.
23 Q. And do you know what role, if any, Nadia
24 Marcenacova ever played in any of what would go on
25 behind the bedroom door with Mr. Epstein?

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1 A. Nadia was the number one girlfriend for
2 Mr. Epstein. Very sweet girl, and she was always
3 -- she would come over to the house but different
4 girls with her all the time.
5 Q. Okay. But Nadia, that's somebody who
6 lives in New York?
7 A. Nadia, I believe, yes, her address is in
8 New York.
9 Q. So how often would she stay at 358 El
10 Brillo?
11 A. Very often.
12 Q. Usually every time when Mr. Epstein was
13 there?
14 A. Yes.
15 Q. And she would for the most time fly on
16 the plane with Mr. Epstein?
17 A. Yes.
18 Q. And it would be her and Mr. Epstein and
19 oftentimes some other girls?
20 A. Exactly.
21 Q. Where some points I think earlier when
22 Mr. Mermelstein was asking you questions where
23 there was some confusion was we're talking about
24 two different sets of girls, the girls that would
25 come over and be labelled masseuses from the Palm

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1 Beach area, and the girls that would fly on the
2 plane with Mr. Epstein and Ms. Marcenacova.
3 So, what I'm asking you is what, if any,
4 involvement did Nadia Marcenacova have with the
5 girls that would arrive and be labeled as
6 masseuses behind closed doors with Mr. Epstein?
7 MR. CRITTON: Form.
8 THE WITNESS: He was the second -- the
9 first role was Sarah and she was always --
10 Nadia is a very shy person so she will be in
11 the background.
12 BY MR. EDWARDS:
13 Q. Did you ever know of Nadia Marcenacova to
14 engage in -- to be in the room with Mr. Epstein
15 while any of these young girls were up there?
16 MR. CRITTON: Form.
17 THE WITNESS: Yeah.
18 BY MR. EPSTEIN:
19 Q. How often do you remember Nadia and Mr.
20 Epstein being in the room with any of these young
21 girls?
22 A. I would say most of the time.
23 Q. Nadia would go up there too?
24 A. Yeah.
25 Q. Did you ever believe that Nadia was

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1 Q. Would you know the name if I said it?
2 A. Yeah.
3 Q. Bill Riley?
4 A. Yes.
5 Q. Okay. Have you ever spoken with an
6 investigator Paul Lavery?
7 A. Could be, I'm not sure.
8 Q. Okay. So Bill Riley came by your house
9 personally?
10 A. Yes.
11 Q. And how long did you meet with him?
12 A. Five minutes. He gave me his card, he
13 gave me Mr. Critton telephone number, he said
14 don't talk to Mr. Goldberger.
15 Q. Did he tell you why you should call Mr.
16 Critton?
17 A. No. I assume that he was not on the case
18 anymore, but I didn't ask questions but --
19 Q. You assumed that who wasn't on the case
20 anymore?
21 A. Mr. Goldberger, Jack Goldberger.
22 Q. Okay. But what I'm asking you, I guess,
23 is did this investigator, Mr. Riley, tell you why
24 it was important for you to call any attorney
25 that's associated with Mr. Epstein, why was that

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1 important?
2 A. He didn't say that. He didn't say that.
3 He just said that get in touch and that's it.
4 Because I said what am I going to do, because I
5 said I thought this was -- you know, but I didn't
6 know I was going to be subpoena. And like I said
7 in the beginning of this deposition, I don't have
8 an attorney so I don't have money, first of all,
9 to pay for an attorney. First of all, I don't
10 think I'm in trouble, but every time you hear high
11 powered lawyers you feel intimidated so I said,
12 listen, what am I going to do, and that was my
13 basic question.
14 Q. Okay. So then you spoke with somebody at
15 Mr. Critton's office and arranged to meet with him
16 personally?
17 A. Yes. I called his secretary and we sit
18 down with his assistant, the three of us.
19 Q. So it was Mr. Critton, yourself, and
20 somebody else?
21 A. Yes.
22 Q. And you sat down for another two hour
23 period of time?
24 A. Yes.
25 Q. And what did you go over in that meeting?

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1 A. We discuss -- he asked me a lot of
2 questions, obviously he didn't know a lot of
3 things about the case, and I told him who I was,
4 what I did in the house.
5 Q. He told you he didn't know a lot about
6 the case?
7 A. No, no, no. He asked me questions about
8 so I got the feeling that Mr. Critton didn't know
9 as much as other lawyers.
10 Q. Okay. Did you tell him what you told us
11 here today?
12 A. No. He asked me tell the truth, you
13 know, just go over there, you know, he advise me
14 like you're on your own, Alfredo, just tell the
15 truth, you know. He didn't give me any advice.
16 He paid for my gas. Thank you very much.
17 And that's it, you know.
18 The main thing I wanted to have a lawyer
19 on my side but then I keep going to the first
20 instance when my wife told me you don't need a
21 lawyer, and I'm here today to say that, I'm here,
22 I'm speaking the truth.
23 Q. Okay. You mentioned there were five or
24 six computers in the house?
25 A. Yes.

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1 Q. And do you know what happened to the
2 computers?
3 A. No.
4 Q. You don't know where they are?
5 A. (Shakes head.)
6 Q. Nobody has told you?
7 A. No.
8 Q. You also mentioned there were photographs
9 in the house?
10 A. In the computers in the files.
11 Q. Okay. But there were also still
12 photographs around the house?
13 A. Oh yes, yes.
14 Q. Some of the girls have made the
15 allegation that there were photographs of them
16 nude in the house. Do you remember seeing that?
17 A. In the closet, yeah, in a mosaic. It was
18 one frame with probably 15 pictures, small
19 pictures.
20 MR. CRITTON: Repeat the question back.
21 BY MR. EDWARDS:
22 Q. Okay. Some of the girls that have
23 lawsuits against Mr. Epstein with allegations
24 similar to the allegations that C. and T. have
25 made, which is that they were underage when Mr.

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1 Epstein was engaging in sex or sex acts with them,
2 also say that they have seen pictures of
3 themselves in frames in Mr. Epstein's house naked.
4 A. In his closet.
5 Q. Other than the picture -- and these are
6 girls who are making the allegation that they were
7 underage and there were pictures of them nude in
8 his house.
9 A. I didn't see pictures of C. there.
10 Q. I'm not talking about C. I'm saying
11 other girls that were underage or have made
12 allegations that they have seen pictures of
13 themselves in Mr. Epstein's house.
14 MR. CRITTON: Form.
15 BY MR. EDWARDS:
16 Q. Where would those photos have been, or
17 did you see them?
18 A. Yes, I see them inside his closet.
19 Q. It's one mosaic?
20 A. Yes, one mosaic.
21 Q. Other than there did you see any of these
22 pictures of young girls nude anywhere else in the
23 house?
24 MR. CRITTON: Form.
25 THE WITNESS: Nude with an art, yes, but

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1 not pornography. You know, I saw them, they
2 were all over the place. For instance, in
3 the back only showing part of the rear, you
4 know.
5 BY MR. EDWARDS:
6 Q. But the photographs that I'm concerned
7 with --
8 A. Not frontal pictures.
9 Q. The photographs I'm concerned with are
10 photographs of these West Palm Beach girls that
11 were labeled as masseuses that are being displayed
12 around the house anywhere in some state of
13 undress.
14 MR. CRITTON: Form.
15 THE WITNESS: No, I don't remember that.
16 BY MR. EDWARDS:
17 Q. Okay. The only girls that -- the only
18 photograph that you remember of young girls nude
19 was in a mosaic that is in his closet?
20 A. Yes.
21 Q. Nothing that you remember that was on
22 display?
23 A. Downstairs, yes, but they were not these
24 girls, they were somebody else.
25 Q. Okay. Do you know who was -- who were in

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1 those photos?
2 A. One was a Columbian lady and one was --
3 one from Spain, beautiful girls, that, you know,
4 but they were not -- not the ones the girls we're
5 talking about here.
6 Q. Okay. When you were hired were you hired
7 by Mr. Epstein or were you hired by one of his
8 companies?
9 A. Mrs. Maxwell.
10 Q. So it was -- was it a company owned by
11 Mrs. Maxwell?
12 A. Not directly. My paycheck was Jeffrey
13 Epstein. I mean, I was hired by Mr. Epstein
14 but --
15 Q. Okay. I just understood you to say you
16 were hired by Mrs. Maxwell.
17 A. Exactly, she told me you're hired but
18 you're going to get paid by Mr. Epstein.
19 Q. And he wrote you personal checks?
20 A. No. The checks that came from New York,
21 Jeffrey Epstein Companies.
22 Q. It was out of his company?
23 A. Yes.
24 Q. Which company; do you know?
25 A. 456 Madison Avenue. It's next to the New

Page 257

1 York Palace now.
2 Q. The name of the company is 456 Madison
3 Avenue?
4 A. No, no, it's -- I got it on the tip of my
5 tongue. Something like Caribbean or island
6 something investments, something like that.
7 If you call Lesley, her secretary, she
8 will tell you exactly. Because they answer the
9 phone like that, you know.
10 Q. What's Lesley's number?
11 A. Lesley, I don't have it. I can find out
12 for you.
13 Q. Do you think you could get Lesley's
14 number for us?
15 A. Yes. It's in Manhattan.
16 Q. Does she work for this company in
17 Manhattan?
18 MR. CRITTON: Form.
19 THE WITNESS: Manhattan, yes.
20 BY MR. EDWARDS:
21 Q. If the check was issued did Jeffrey
22 Epstein actually sign it himself?
23 A. No, it came through the comptroller.
24 Q. Who was the comptroller?
25 A. Bella was the assistant comptroller and

Page 266

1 BY MR. LANGINO:
2 Q. Are you currently in fear of Mr. Epstein?
3 A. Not at this particular moment but it's
4 something I have to be worry about, yes.
5 Q. Are you personally afraid of criminal
6 prosecution?
7 A. No.
8 Q. Do you believe that you did anything
9 illegal?
10 A. Illegal, no.
11 MR. LANGINO: I have no further
12 questions. Thank you.
13 MR. CRITTON: We're going to break in
14 about 15 minutes. Do you want to start and
15 go for 15 minutes or do you want to -- it's
16 up to you.
17 MS. EZELL: I'll start.
18 MR. WILLITS: When are we going to quit,
19 folks?
20 MR. CRITTON: In 15 minutes.
21 THE VIDEOGRAPHER: Might as well change
22 tapes.
23 MR. EDWARDS: Bob has to get back so
24 we've agreed we're going to come back some
25 other time.

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1 MR. WILLITS: Why don't we just stop now?
2 MS. EZELL: Okay.
3 MR. EDWARDS: Rather than you start.
4 MS. EZELL: Yeah, I won't get very far.
5 MR. EDWARDS: Sorry to do this with you,
6 we didn't finish.
7 MR. CRITTON: So we're stopped?
8 MR. EDWARDS: We're stopped.
9 THE VIDEOGRAPHER: Off the record.
10 (Thereupon, the videotaped deposition was
11 adjourned at 5:30 p.m.)
12 - - -
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Page 268

1 THE STATE OF FLORIDA,)
2 COUNTY OF DADE.)
3
4
5 I, the undersigned authority, certify
6 that ALFREDO RODRIGUEZ personally appeared before
7 me on the 29th day of July, 2009 and was duly
8 sworn.
9
10 WITNESS my hand and official seal this
11 31st day of July, 2009.
12
13
14
15 ____________________________
MICHELLE PAYNE, Court Reporter
16 Notary Public - State of Florida
17
18
19
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Page 269

1 CERTIFICATE
2
The State Of Florida,)
3 County Of Dade.)
4
5 I, MICHELLE PAYNE, Court Reporter and
Notary Public in and for the State of Florida at
6 large, do hereby certify that I was authorized to
and did stenographically report the videotaped
7 deposition of ALFREDO RODRIGUEZ; that a review of
the transcript was requested; and that the
8 foregoing pages, numbered from 1 to 269,
inclusive, are a true and correct transcription of
9 my stenographic notes of said deposition.
10 I further certify that said videotaped
deposition was taken at the time and place
11 hereinabove set forth and that the taking of said
videotaped deposition was commenced and completed
12 as hereinabove set out.
13 I further certify that I am not an
attorney or counsel of any of the parties, nor am
14 I a relative or employee of any attorney or
counsel of party connected with the action, nor am
15 I financially interested in the action.
16 The foregoing certification of this
transcript does not apply to any reproduction of
17 the same by any means unless under the direct
control and/or direction of the certifying
18 reporter.
19 DATED this 31st day of July, 2009.
20
21 ____________________________
MICHELLE PAYNE, Court Reporter
22
23
24
25

1 UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
2
3 JANE DOE NO. 2, CASE NO: 08-CV-80119
4 Plaintiff,
5 Vs.
6 JEFFREY EPSTEIN,
7 Defendant.
________________________/
8
JANE DOE NO. 3, CASE NO: 08-CV-80232
9
Plaintiff,
10
Vs.

CONDENSED

11
JEFFREY EPSTEIN,
12
Defendant.
13 ________________________/
14 JANE DOE NO. 4, CASE NO: 08-CV-80380
15 Plaintiff,
16 Vs.
17 JEFFREY EPSTEIN,
18 Defendant.
________________________/
19
JANE DOE NO. 5, CASE NO: 08-CV-80381
20
Plaintiff,
21
Vs
22
JEFFREY EPSTEIN,
23
Defendant.
24 ________________________/
25

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1 JANE DOE NO. 6, CASE NO: 08-CV-80994
2 Plaintiff,
3 Vs.
4 JEFFREY EPSTEIN,
5 Defendant.
_______________/
6
JANE DOE NO. 7, CASE NO: 08-CV-80993
7
Plaintiff,
8
Vs.
9
JEFFREY EPSTEIN,
10
Defendant.
11 _______________/
12 C.M.A., CASE NO: 08-CV-80811
13 Plaintiff,
14 Vs.
15 JEFFREY EPSTEIN,
16 Defendant.
_______________/
17
JANE DOE, CASE NO: 08-CV-80893
18
Plaintiff,
19
Vs.
20
JEFFREY EPSTEIN,
21
Defendant.
22 _______________/
23
24
25

Page 272

1 JANE DOE NO. II, CASE NO: 08-CV-80469
2 Plaintiff,
3 Vs.
4 JEFFREY EPSTEIN,
5 Defendant.
_______________/
6
JANE DOE NO. 101 CASE NO: 08-CV-80591
7
Plaintiff,
8
Vs.
9
JEFFREY EPSTEIN,
10
Defendant.
11 _______________/
12 JANE DOE NO. 102, CASE NO: 08-CV-80656
13 Plaintiff,
14 Vs.
15 JEFFREY EPSTEIN,
16 Defendant.
_______________/
17
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Page 273

1 IN THE CIRCUIT COURT OF THE 15TH
JUDICIAL CIRCUIT IN AND FOR
2 PALM BEACH COUNTY, FLORIDA
3 CASE NO. 502008CA037319XXXXMB AB
4
B.B.,
5
Plaintiff,
6
Vs.
7
JEFFREY EPSTEIN.
8
Defendant.
9 _______________/
10
11
12 1031 Ives Dairy Road
Suite 228
13 North Miami, Florida
August 7, 2009
14 1:15 p.m. to 5:30 p.m.
15
16 CONTINUED
17 VIDEOTAPED
18 DEPOSITION
19 of
20 ALFREDO RODRIGUEZ
21
22 taken on behalf of the Plaintiffs pursuant
23 to a Re-Notice of Taking Continued Videotaped
24 Deposition (Duces Tecum)
25 - - -

Page 274

1 APPEARANCES:
2
3 MERMELSTEIN & HOROWITZ, P.A.
BY: ADAM HOROWITZ, ESQ.
4 18205 Biscayne Boulevard
Suite 2218
5 Miami, Florida 33160
Attorney for Jane Doe 2, 3, 4, 5,
6 6, and 7.
7
8 ROTHSTEIN ROSENFELDT ADLER
BY: BRAD J. EDWARDS, ESQ., and
9 CARA HOLMES, ESQ.
Las Olas City Centre
10 Suite 1650
401 East Las Olas Boulevard
11 Fort Lauderdale, Florida 33301
Attorney for Jane Doe and E.W.
12 And L.M.
13
14 PODHURST ORSECK
BY: KATHERINE W. EZELL, ESQ.
15 25 West Flagler Street
Suite 800
16 Miami, Florida 33130
Attorney for Jane Doe 101 and 102.
17
18
LEOPOLD-KUVIN
19 BY: ADAM J. LANGINO, ESQ.
2925 PGA Boulevard
20 Suite 200
Palm Beach Gardens, Florida 33410
21 Attorney for B.B.
22
23
24
25

Page 299

1 A. I don't remember, Ma'am. He came from
2 New Albany, Ohio.
3 Q. From New --
4 A. New Albany, Ohio.
5 Q. New Albany, Ohio. Did he have his own
6 business?
7 A. No, he worked for Mr. Epstein. He will
8 maintain all the computers.
9 Q. Was he there everyday?
10 A. No, ma'am.
11 Q. Do you know whether at that time Mr.
12 Epstein had an office in Palm Beach?
13 A. Not outside the house, no.
14 Q. Do you have any knowledge of whether or
15 not the video equipment was -- and I don't know
16 the technical term, forgive me, but was it the
17 kind of equipment that would record for a certain
18 amount of time and then record over that film?
19 A. I don't know.
20 MR. CRITTON: Form.
21 BY MS. EZELL:
22 Q. You don't know?
23 A. No, ma'am.
24 MR. CRITTON: Just for clarification, I
25 may have misunderstood, but I thought he

Page 300

1 said he didn't even know the video equipment
2 existed until he read the FBI report.
3 MS. EZELL: He said he didn't know that
4 it was upstairs and downstairs, I believe.
5 MR. CRITTON: I thought he said he didn't
6 know that it even existed.
7 MS. EZELL: I may be wrong.
8 BY MS. EZELL:
9 Q. Did you know it existed before you read
10 the FBI report?
11 A. No, ma'am.
12 Q. I'm sorry, then I was wrong.
13 How did you know then that the young
14 technician from Ohio maintained the computers and
15 the video equipment?
16 A. Because we used to request -- there were
17 always problems with the computers so he came to
18 the house and he was the programmer. It was very
19 sophisticated.
20 MR. CRITTON: Form to the last question,
21 move to strike the answer as nonresponsive.
22 BY MS. EZELL:
23 Q. How did you know then that he maintained
24 the video equipment as well?
25 A. Because he was in charge of computers,

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1 video, even phones.
2 Q. Would he also repair the televisions if
3 they needed work?
4 A. No.
5 Q. No. Did you have any kind of intercom
6 system in the house?
7 A. Yes, ma'am.
8 Q. And what kind of system was that?
9 A. It was standard office equipment, Lucid
10 Technologies maybe, but it was an intercom like we
11 using right now.
12 MS. EZELL: Just let the record reflect
13 that the witness pointed to the telephone on
14 the table that has a speaker phone.
15 THE WITNESS: Yes, ma'am.
16 BY MS. EZELL:
17 Q. And did you use that in your work?
18 A. Yes, ma'am.
19 Q. And what did you use it for?
20 A. Mr. Epstein used to page me when he
21 needed me.
22 Q. Did you have one of those phones in the
23 kitchen?
24 A. Yes, ma'am.
25 Q. And was there one out in the staff house

Page 302

1 as well?
2 A. Yes, ma'am.
3 Q. Do you know where others were in the
4 house?
5 A. Probably have like 15 phones. We used to
6 have three in the staff house, one in the cabana,
7 two in the master bedroom, one in each room,
8 kitchen, dining room, Mrs. Maxwell's office, the
9 garage.
10 Q. Where was Mrs. Maxwell's office?
11 A. Under the stairs next to the kitchen.
12 Q. Can you give me some idea of what size
13 space that was?
14 A. It was probably -- we change the floor.
15 Twelve by five, something like that.
16 Q. And was the computer equipment in that
17 space?
18 A. Yes, ma'am.
19 Q. Do you know whether Ms. Maxwell kept the
20 names and telephone numbers of the girls who came
21 to do massages?
22 A. Yes, ma'am.
23 MR. CRITTON: Form.
24 BY MS. EZELL:
25 Q. Do you know that because you saw the

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1 names and phone numbers?
2 MR. CRITTON: Form.
3 THE WITNESS: Yes, ma'am.
4 BY MS. EZELL:
5 Q. Do you know if she kept pictures of the
6 girls on the computer?
7 A. Yes, she did.
8 Q. And you know that as well because you
9 happen to see them?
10 A. Yes, ma'am.
11 MR. CRITTON: Form to the last two
12 questions.
13 BY MS. EZELL:
14 Q. Were they similar to the pictures that
15 Ms. Kellen had on her computer?
16 MR. CRITTON: Form.
17 THE WITNESS: Yes, ma'am.
18 BY MS. EZELL:
19 Q. Did the pictures that they kept there
20 look like pictures that were posed?
21 A. They were more casual.
22 Q. Did they look as though the person being
23 photographed knew that they were being
24 photographed?
25 MR. CRITTON: Form.

Page 304

1 THE WITNESS: No, ma'am.
2 BY MS. EZELL:
3 Q. And what can you tell me about that, what
4 lead you to draw that conclusion?
5 A. They were probably taken in parties in
6 big reception or banquet.
7 MR. CRITTON: Let me offer as a
8 suggestion, not that you have to accept or
9 that you would, you're using the term young
10 girls generically, he has probably seen
11 many, many young girls, there was no --
12 you've used it interchangeably with just
13 young girls versus young girls who may have
14 come to -- purported to give a massage and,
15 therefore, that may be a different answer,
16 so that's part of my form objection.
17 MS. EZELL: Okay, thank you.
18 BY MS. EZELL:
19 Q. When I asked you about Ms. Kellen whether
20 she had a list of the girls and telephone numbers,
21 I think I asked about those girls that came to
22 give massages, but let me go back and just ask it
23 that way.
24 Did you notice that Ms. Kellen had a list
25 of the girls that came to give massages on her

Page 305

1 computer?
2 MR. CRITTON: Form.
3 THE WITNESS: Yes, ma'am.
4 BY MS. EZELL:
5 Q. And did she generally have phone numbers
6 for those girls?
7 A. Yes, ma'am.
8 Q. And were they generally pictures of the
9 girls?
10 MR. CRITTON: Form.
11 THE WITNESS: No, ma'am.
12 BY MS. EZELL:
13 Q. And did Ms. Maxwell have a list of the
14 girls who came to give massages?
15 MR. CRITTON: Form.
16 THE WITNESS: Yes, ma'am.
17 BY MS. EZELL:
18 Q. Did she have telephone numbers generally?
19 A. Yes, ma'am.
20 MR. CRITTON: Form.
21 BY MS. EZELL:
22 Q. Were there pictures on her computer of
23 the girls who came to give massages?
24 MR. CRITTON: Form.
25 BY MS. EZELL:

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1 Q. Ms. Maxwell I'm talking about.
2 A. Yes, ma'am.
3 Q. And were those pictures the more casual
4 ones that you described when I asked whether or
5 not the subject looked as though she knew she was
6 being photographed?
7 MR. CRITTON: Form.
8 THE WITNESS: I'm sorry, can you repeat?
9 BY MS. EZELL:
10 Q. Yeah. The pictures of the young girls
11 who came to the house to give massages that were
12 on Ms. Maxwell's computer, did they appear to have
13 been taken when the girls knew they were being
14 photographed?
15 MR. CRITTON: Form.
16 THE WITNESS: I don't think they knew
17 they were being photographed.
18 BY MS. EZELL:
19 Q. I believe you said they were more casual
20 pictures.
21 A. Yes, ma'am.
22 Q. Did you notice any nude photographs in
23 those pictures?
24 A. Yes, ma'am.
25 MR. CRITTON: Form for the last question.

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1 THE STATE OF FLORIDA,)
2 COUNTY OF DADE.)
3
4
5 I, the undersigned authority, certify
6 that ALFREDO RODRIGUEZ personally appeared before
7 me on the 7th day of August, 2009 and was duly
8 sworn.
9
10 WITNESS my hand and official seal this
11 18th day of August, 2009.
12
13
14
15 ____________________________
MICHELLE PAYNE, Court Reporter
16 Notary Public - State of Florida
17
18
19
20
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25

Page 472

1 CERTIFICATE
2
The State Of Florida,)
3 County Of Dade.)
4
5 I, MICHELLE PAYNE, Court Reporter and
Notary Public in and for the State of Florida at
6 large, do hereby certify that I was authorized to
and did stenographically report the deposition of
7 ALFREDO RODRIGUEZ; that a review of the transcript
was not requested; and that the foregoing pages,
8 numbered from 270 to 472, inclusive, are a true
and correct transcription of my stenographic notes
9 of said deposition.
10 I further certify that said deposition was
taken at the time and place hereinabove set forth
11 and that the taking of said deposition was
commenced and completed as hereinabove set out.
12
I further certify that I am not an
13 attorney or counsel of any of the parties, nor am
I a relative or employee of any attorney or
14 counsel of party connected with the action, nor am
I financially interested in the action.
15
The foregoing certification of this
16 transcript does not apply to any reproduction of
the same by any means unless under the direct
17 control and/or direction of the certifying
reporter.
18
DATED this 18th day of August, 2009.
19
20
____
21 MICHELLE PAYNE, Court Reporter
22
23
24
25

EXHIBIT 22
(Filed Under Seal)

United States District Court
For The Southern District of New York

Giuffre v. Maxwell
15-cv-07433-RWS
Ghislaine Maxwell's Privilege Log Amended as of August 1, 2016

*****Per Local Rule 26.2, the following privileges are asserted pursuant to British law, Colorado law and NY law.**

Log ID	DATE	DOC. TYPE	BATES #	FROM	TO	CC	RELATIONSHIP OF PARTIES	SUBJECT MATTER
1.	2011.03.15	E-Mails	1000-1013	Ghislaine Maxwell	Brett Jaffe, Esq.		Attorney / Client	Communication re: legal advice
2.	2011.03.15	E-Mails	1014-1019	Brett Jaffe, Esq.	Ghislaine Maxwell		Attorney / Client	Communication re: legal advice
3.	2015.01.02	E-Mails	1020-1026	Ross Gow	Ghislaine Maxwell		Attorney Agent / Client	Communication re: legal advice
4.	2015.01.02	E-Mail	1024-1026	Ghislaine Maxwell	Ross Gow		Attorney Agent / Client	Communication re: legal advice
5.	2015.01.02	E-Mail	1027-1028	Ross Gow	Ghislaine Maxwell	Brian Basham	Attorney Agent / Client	Communication re: legal advice
6.	2015.01.06	E-Mail	1029	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
7.	2015.01.06	E-Mail	1030-1043	Ghislaine Maxwell	Jeffrey Epstein, Alan Dershowitz, Esq.		Attorney / Client	Communication re: legal advice
8.	2015.01.10	E-Mail	1044	Ghislaine Maxwell	Philip Barden, Esq., Ross Gow		Attorney / Client	Communication re: legal advice
9.	2015.01.10	E-Mail	1045-1051	Ghislaine Maxwell	Philip Barden, Esq.		Client / Attorney	Communication re: legal advice
10.	2015.01.09 - 2015.01.10	E-Mails	1052-1055	Ross Gow	Philip Barden, Esq.	G. Maxwell	Agent / Attorney / Client	Communication re: legal advice
11.	2015.01.11	E-Mail	1055-1058	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
12.	2015.01.11	E-Mail	1055-1058	Philip Barden, Esq.	Ross Gow	G. Maxwell	Attorney / Agent / Client	Communication re: legal advice
13.	2015.01.11	E-Mail	1056-1058	Philip Barden, Esq.	Ghislaine Maxwell	Ross Gow	Attorney / Agent / Client	Communication re: legal advice

14.	2015.01.11 - 2015.01.17	E-Mails	1059-1083	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice
15.	2015.01.13	E-Mail	1067-1073	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
16.	2015.01.13	E-Mail	1069-1073, 1076-1079	Philip Barden, Esq.	Martin Weinberg, Esq.		Common Interest	Communication re: legal advice
17.	2015.01.13	E-Mails	1068-1069, 1074-1076	Philip Barden, Esq.	Ghislaine Maxwell	Mark Cohen	Attorney / Client	Communication re: legal advice
18.	2015.01.21	E-Mail	1088-1090	Ross Gow	Philip Barden, Esq., Ghislaine Maxwell		Agent / Attorney / Client	Communication re: legal advice
19.	2015.01.21 - 2015.01.27	E-Mails	1084-1098	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Communication re: legal advice
20.	2015.01.21-2015.01.27	E-Mails	1099	Ghislaine Maxwell	Jeffrey Epstein		Common Interest	Communication re: legal advice
21.	2015.04.22	E-mail	7 pages	Jeffrey Epstein	Ghislaine Maxwell		Common Interest	Forwarding message from Martin Weinberg labeled "Attorney Client Privilege" with attachment
22.	Various	E-mails		Agent of Haddon, Morgan & Foreman; Laura Menninger	Agent of Haddon, Morgan & Foreman; Laura Menninger		Agent of attorney and Attorney	Attorney work product
23.	Various	E-mails		Mary Borja; Laura Menninger	Mary Borja; Laura Menninger		Attorney Work Product	Attorney work product
24.	2015.10.21 - 2015.10.22	E-mail chain with attachment		Darren Indyke; Laura Menninger	Darren Indyke; Laura Menninger		Attorneys for parties to Common Interest Agreement	Common Interest Agreement
25.	2015.01.06						Attorney/Client	Document prepared by Ghislaine Maxwell at the direction of Philip Barden

26.	2015.01.23						Attorney/Client	Document prepared by Ghislaine Maxwell at the direction of Philip Barden

EXHIBIT 23
(Filed Under Seal)

Expert Report of Professor Terry Coonan, J.D.

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(B)

Giuffre v. Maxwell
Case No. 15-cv-07433-RWS

international commercial dimensions of the sex trafficking scheme recounted by Ms. Giuffre. It is both factually and legally correct to characterize what Ms. Giuffre experienced as victimization in a sex trafficking conspiracy.

Conclusion 4

Virginia Roberts Giuffre's account appears credible and consistent in its most salient parts with the testimony of other witnesses and with contemporary trends in U.S. sex trafficking.

The description of exploitation recounted by Ms. Giuffre, while not the most common sex trafficking scenario (many cases involve even more brutal forms of pimp-driven prostitution) nonetheless is quite consistent with larger patterns of commercial sexual exploitation. The conspiracy in this case was premised upon the exploitation of minors and young women who seem to have had certain identifiable vulnerabilities that rendered them prone to exploitation. The criminal scheme that emerges from the depositions and police reports involved a very calculated pattern of recruiting, grooming, and an attempt to "normalize" the repeated exploitation of its victims.

While the accounts of witnesses vary in some of their details, the essential elements of a sex trafficking conspiracy clearly emerge when viewed in the totality of the circumstances that are recounted in the case record. Ms. Giuffre refers to herself at times as a "sex slave." This is not factually incorrect, given her experiences, though current U.S. law might prefer to characterize her as a victim of sex trafficking. Popular understandings of the term "sex slave" might still connote images of violent pimps, white slavery, or of victims chained to a bed in a brothel in the minds of some people. To call Ms. Giuffre a victim of sex trafficking would however very accurately convey the reality that she along with a great many other victims of contemporary forms of slavery are often exploited by the "invisible chains" of fraud and psychological coercion.

EXHIBIT 24
(Filed Under Seal)

Expert Witness Report of

Dr. Bernard J. Jansen
Professor
College of Information Sciences and Technology
The Pennsylvania State University

Regarding the case of:

Virginia Giuffre
v.
Ghislaine Maxwell

(U.S. District Court for the Southern District of New York)

9 September 2016

I. INTRODUCTION

1. I have been retained by the law firm of Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L. to provide expert analysis and opinion on behalf of Ms. Virginia Giuffre in VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433, which is pending in the United States District Court Southern District of New York.

II. QUALIFICATIONS

2. I am a tenured, full professor at the College of Information Sciences and Technology at The Pennsylvania State University, University Park, Pennsylvania, where I have been employed since 2001. I am the Director of the Information Searching and Learning Laboratory at the College of Information Sciences and Technology at The Pennsylvania State University. I am also a principal scientist at the Qatar Computing Research Institute. I was a Senior Fellow at the Pew Internet & American Life Project, which is part of the Pew Research Center, from 2010 through 2012. I was also a University Expert at the National Ground Intelligence Center from 2011 through 2014. Prior to my employment at The Pennsylvania State University, I was a Lecturer in the Computer Science Program at the University of Maryland (Asian Division) for 1 year. Before that I was an Assistant Professor and Lecturer in the Department of Electrical Engineering and Computer Science at the United States Military Academy, a.k.a. West Point, for 3 years.

3. In addition to my academic credentials, my professional experience includes 20 years of practice in the U.S. military, working primarily in a variety of technology-related and leadership positions.

4. I have authored approximately 250 academic publications, focusing on the areas of Web data, digital analytics, Web analytics, Web searching, Web search engines, social media analytics, and related areas. Approximately 200 of my publications address aspects of search

analytics, Web analytics, online advertising, search engines, or Web searching. My recent research work focuses on online news analytics, which is the investigation of the online qualitative and quantitative attributes of news stories, along with other digital content. I am also the editor-in-chief of the academic journal Information Processing and Management, and I was previously the editor-in-chief for 5 years of the academic journal, Internet Research. I have authored, co-authored, or co-edited four books, including Web Search: Public Searching of the Web (2007), Understanding User – Web Interactions via Web Analytics (2009) and Understanding Sponsored Search (2011). A copy of my complete curriculum vitae, which includes a list of all publications I have authored in the past 10 years, is attached as **Appendix A**.

5. My fields of professional expertise include web analytics, search engines, web searching, social media, online advertising, and related areas. In the course of my academic career, I have worked with a variety of search engines and information searching applications in order to understand user searching behavior on the Web and other environments. For example, as part of my Master's program in computer science, I designed and coded a text-based search engine. For my Doctorate program in computer science, I developed a program interface for Web search engines and implemented it on the Gigabyte search engine. In subsequent research, I have worked with the Microsoft Internet Information Services (IIS) and Verity commercial searching systems.

6. Concerning user searching behaviors on the Web using web analytics, I have worked directly with real-user searching data from several search engines, including AOL, Alta Vista, Dogpile, Excite, and MSN Live. I've also analyzed web data of visitor traffic and other attributes from a variety of websites and social media platforms. I've analyzed real-user data from online search marketing campaigns and user referral traffic to websites. I have conduct research and teaching concerning aspects of websites and social media platforms, including keyword

advertising. I've developed web analytics models and processes for analysis of business goals, and I have used web analytics data and commercial tools in both my research and teaching. I've also conducted other research on user searching and related online behaviors. I have advised governmental agencies and companies in consulting and expert witnessing matters. A list of cases in which I have testified as an expert in deposition or trial in the past four years is attached as **Appendix B**. I am being compensated for my work on this case at the rate of $300 per hour.

III. ASSIGNMENT AND MATERIALS CONSIDERED

7. In providing my expert opinion, I have been asked to respond to the following question:

8. **What is the dissemination of the statements from Ms. Maxwell referring to Ms. Giuffre's declarations as "untrue" and "lies" from when the statements were made on 2 January 2015 to the date that I filed this report?**

9. For brevity, I refer to references to the statements denoting Ms. Giuffre's declarations as "untrue" and "lies", any related accounts referring to those original statements, or similar statements from Ms. Maxwell or her representatives referring to Ms. Giuffre as *the statements made against Ms. Giuffre*, *the statements from Ms. Maxwell's message*, or *the message from Mr. Gow*[1].

10. My analysis is based on my experience, training, knowledge, and education and is formed through the application of that experience, training, knowledge, and education in the principles of web data collection, web analytics, web search, search engines, web sites, web traffic analysis, and related market analysis.

11. The materials that I considered in preparing this report are listed in **Appendix C**.

[1] See, para. 30 and 32, Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433.

IV. SUMMARY OF OPINIONS

12. Based on my research and analysis in connection with this assignment, which is described in more detail in the body of this report, along with my own experience, training, knowledge, and education as stated below, I have reached the following opinion:

13. **The statements made against Ms. Giuffre have been disseminated to at least 115 online media or other sites in 178 separate stories or articles with a combined 66,909,965 potential unique visitors since 2 January 2015 to the date that I filed this report, inclusive.**

14. This is a conservative estimate, and it is more likely than not, the statements made by Ms. Maxwell against Ms. Giuffre have received wider dissemination due to factors such as:

a. I used a set of online websites to measure dissemination, and it is reasonable that I have not located all references to the statements made against Ms. Giuffre on every website by the time of the submission of this report.

b. I examined only online sources referencing the statements made against Ms. Giuffre and not print or broadcast media dissemination of the statements made against Ms. Giuffre.

c. I have not attempted to measure face-to-face dissemination of articles containing the statements against Ms. Giuffre.

d. I do not have access to certain online sources where articles containing the statements against Ms. Giuffre may have been disseminated (e.g., email messages, personal social media messages, articles behind firewalls, etc.).

e. There are possibly sites that have hosted the statements made against Ms. Giuffre that I could not locate or where the statements have been removed.

f. There are sites that hosted the articles containing the statements made against Ms. Giuffre where the visitor data is not accessible or where I could not confirm the number of visitors.

g. I did not consider the dissemination via social media platforms of articles containing the statements made against Ms. Giuffre.

h. Many sites published multiple articles on multiple days that contained or referenced the statements made against Ms. Giuffre; however, I did not include these multiple publication dates in calculating unique daily visitors.

i. I did not include unique daily visitors to articles that link from that article to one or more of the articles containing the statements made against Ms. Giuffre.

j. Finally, I did not include the counts of those who may have been searching and seen the statements made against Ms. Giuffre in the search results listing.

V. BACKGROUND WEB ANALYTICS FOR TRAFFIC ANALYSIS

15. In the course of forming this opinion, I implemented numerous web analytics and related techniques commonly used in the industry. In order to more clearly discuss these techniques, I define the following terms:

- **Direct Traffic**: visitors to a website that come from entering a website link into a browser location bar (e.g., not coming via a link on another website).

- **Dissemination**: the act of spreading or the circulation of information or articles.

- **Domain**: a specific Internet website that are administered as a unit and defined by an Internet Protocol (IP) address.

- **<u>Reach</u>**: the percentage or number of people who visit a website out of the total targeted population.

- **<u>Referral Traffic</u>**: visitors to a site that come from websites other than search engines.

- **<u>Repeat Visits</u>**: visitor traffic to a website in a given period that **just** includes multiple visits from the same set of IP addresses (i.e., IP addresses with more than one visit); provides a count of the people who have visited a site more than once in a given period. An individual is usually defined by a combination of IP address and browser within a given period but can also be defined by more sophisticated methods.

- **<u>Search Engine</u>**: a program and associated hardware and processes that allows people to find information on the Web, typically via the submission of queries consisting of terms.

- **<u>Search Traffic:</u>** visitors to a site that come from search engines rather than from other websites or via direct navigation.

- **<u>Search</u>**: a submission of a query to a search engine, usually in the form of terms forming a query.

- **<u>Share</u>**: sharing of an article or webpage typically via some social media platform.

- **<u>Social Media</u>**: content that is shared via a social networking website.

- **<u>Unique Visits</u>**: visitor traffic to a website within a given period that includes only the first visit (i.e., subsequent visits are ignored), which excludes repeat visits; provides a count of the individuals who have visited a site in a given period.

- **Unique Daily Visitors**: visitor traffic to a website who visits a site at least once in a given 24-hour period. Each visitor, to the site, is counted once during the reporting period, which means it excludes repeat visits; provides a count of the individuals who have visited a site on a given day.

- **Visits**: a count of all the traffic to a website in a given period, including both unique and repeat visits.

- **Web Analytics**: the measurement, collection, analysis and reporting of web data.

VI. METHODOLOGY

16. I was asked to determine the dissemination of articles containing the statements made against Ms. Giuffre.

17. In forming my opinion, I utilized accepted web analytics and related methodologies in developing my assessment.

18. To that end, I employed various publicly available online analytic services, as well as some subscription-based services in conducting my research, including:

- **Alexa**: an online service that provides web traffic data and analysis.
- **Compete**: an online service that provides web traffic data and analysis.
- **Google Keyword Tool**: an online service that provides the number of searches for a given set of keywords in a given month on the Google search engine.
- **Google Trends**: an online service that shows how often a particular term is relatively searched on the Google search engine in a given period.
- **SimiliarWeb**: an online service that provides web traffic data and analysis.
- **SpyFu**: an online service providing search data and analytics, including for both paid (i.e., advertisements) and organic (i.e., natural or algorithmic) channels.
- **W3Snoop:** an online service that provides web traffic data and analysis.

19. These tools offer a variety of data and analysis services, and they are frequently utilized by industry professionals in the search engine optimization, web analytics, and search engine marketing fields for market, customer, and competitive analysis. Furthermore, where possible, I did my own assessments, as outlined below, in order to validate the data and analysis results.

20. I also utilized search engines, primarily Google and Bing, to assess the dissemination of articles containing the statements made against Ms. Giuffre.

21. Whenever possible, I used multiple data sources, which is a data verification technique known as triangulation[2], where one uses multiple and disparate sources for analysis and then compare the results from the separate analysis. If the results are similar, it reinforces the conclusion that the overall data analysis is valid.

22. In all of my assessments, I have used the most conservative numbers, meaning that I use the smallest value in arriving at the dissemination of articles containing the statements made against Ms. Giuffre. If I had not employed this conservative estimate, the number of potential dissemination of the articles containing the statements made against Ms. Giuffre would be 102,740,816 (i.e., more than 102 million) daily unique visitors.

23. In situations where I believed that I could not adequately verify the number of individuals or did not have confidence in the numbers in those situations, I did **not** include those numbers in the calculation of daily unique visitors.

24. My analysis is based on my experience, training, knowledge, and education and is formed through the application of that experience, training, knowledge, and education in the

[2] Triangulation (social science) http://en.wikipedia.org/wiki/Triangulation_%28social_science%29

principles of web data collection, web analytics, web search, search engines, web sites, and related areas.

VII. DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

25. My opinion is that articles containing the statements made against Ms. Giuffre have been disseminated to at least 115 online media and others sites in 178 separate stories or articles with a combine 66,909,965 unique daily visitors.

26. This is a conservative estimate, and it is more likely than not, the statements have received wider dissemination due to factors such as:

a. I used a set of online websites (115) to calculate the dissemination of articles, and it is reasonable that I have not located all references to the statements made against Ms. Giuffre by the time of the submission of this report. So, there may be more sites with articles containing the statements made against Ms. Giuffre that are **not** included in my calculations.

b. My focus of analysis was the online dissemination of the statements made against Ms. Giuffre. Therefore, I examined only online sources and **not** dissemination of the statements made against Ms. Giuffre via print or broadcast media. It is reasonable to assume that the statements made against Ms. Giuffre were disseminated via these other channels.

c. I have not attempted to measure face-to-face dissemination of the statements made against Ms. Giuffre. Therefore, these sources of dissemination are **not** included in the count of daily unique visitors.

d. I did not have access to certain online sources where the statements against Ms. Giuffre may have been disseminated (e.g., email messages, social media messages,

articles behind firewalls, etc.). Therefore, these sources are **not** included in the count of daily unique visitors.

e. There may be sites that have hosted articles containing the statements made against Ms. Giuffre where the articles have been removed. Therefore, I did **not** include these sites in my calculation of the unique daily visitors.

f. There are sites where the visitor data is not accessible or where I could not reasonably check the number of visitors. In these cases, even though I had confirmed the site had posted one or more articles containing the statements made against Ms. Giuffre, I did **not** include these sites in my calculation of the unique daily visitors.

g. I did **not** consider the dissemination via social media platforms of articles containing the statements made against Ms. Giuffre.

h. Many sites published multiple articles on multiple days that contain or reference the statements made against Ms. Giuffre; however, I did **not** use these multiple articles from the same site with different publication dates in my calculations in determining the number of daily unique visitors who have been exposed to the articles containing the statements made against Ms. Giuffre.

i. I did **not** include articles that link to one or more of the articles containing the statements made against Ms. Giuffre. Unless the article directly referenced the statements made against Ms. Giuffre, I did **not** include it in my analysis.

j. Finally, I did **not** include people who may been searching and may have seen the statements made against Ms. Giuffre in the search results, without needing to visit the actual articles posted on the websites.

VIII. METHODOLOGY TO DETERMINE THE DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

27. I have been informed that the statements made against Ms. Giuffre were originally contained in an email message from Mr. Ross Gow[3], of Acuity Reputation, acting on behalf of Ms. Maxwell, that was sent on 2 January 2015 at 8:38 pm[4] to, based on the email addresses[5], people at The Mail Online[6], The Independent[7], The Mirror[8], The Times[9], and the BBC[10]. The email message from Mr. Gow contained the statements made against Ms. Giuffre. A screen shot of the email message is shown in Figure 1.

28. **Figure 1: Email message from Mr. Ross Gow containing the statements made against Ms. Giuffre.**

[3] GM_00068 (Gow E-Mail)
[4] I am assuming, based on the location of Mr. Gow's company, Acuity Reputation, that this is date-time stamp for the United Kingdom.
[5] Note: For some reason, the contact at the Mail Online is on the cc: line, while the other recipients are in the to: line. Also, the email message is sent to two recipients at the BBC.
[6] https://en.wikipedia.org/wiki/Mail_Online
[7] https://en.wikipedia.org/wiki/The_Independent
[8] https://en.wikipedia.org/wiki/Daily_Mirror
[9] https://en.wikipedia.org/wiki/The_Times
[10] https://en.wikipedia.org/wiki/BBC_News

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

29. I have been informed that the statements made against Ms. Giuffre were confirmed by Ms. Maxwell in a news article and video[11] aired on 5 January 2015, which I have established by reviewing the video referenced in the news article[12].

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[11] GIUFFRE001120
[12] http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505

30. Additionally, on 8 January 2015, agents reportedly acting on behalf of Ms. Maxwell made statements that the allegations against her were a "web of lies and deceit"[13], which are similar to the statements made against Ms. Giuffre in the message from Mr. Gow.

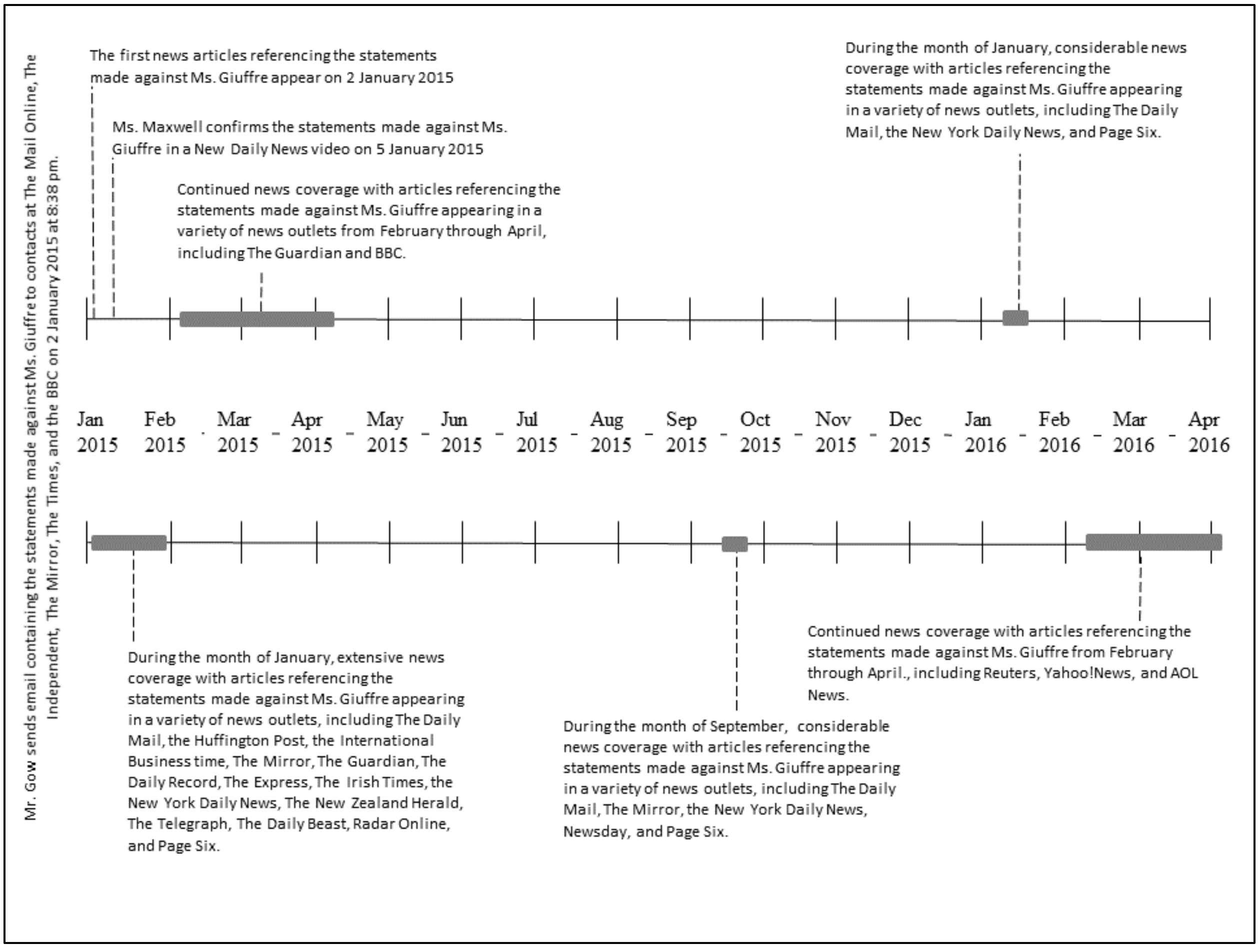
31. Similarly, on 1 February 2015, like statements were quoted as "These allegations are untrue and defamatory"[14], which are similar to the statements made against Ms. Giuffre in the message from Mr. Gow.

32. Based on my investigation and research, news stories, articles, and postings containing direct reference to or quotes from the statements made against Ms. Giuffre appeared the same day (i.e., 2 January 2015) as the email from Mr. Gow, with several news organizations and other sites publishing other articles containing direct reference to or quotes from the statements made against Ms. Giuffre in the immediately following days. News articles containing direct reference to or quotes of the statements made against Ms. Giuffre have continued to appear in news articles and other postings nearly up to the date that I submitted this report.

33. A timeline of events relating to the dissemination of the statements made against Ms. Giuffre is shown in Figure 2.

34. **Figure 2: Timeline of events relating to the dissemination of the statements made against Ms. Giuffre from 2 January 2015 onwards.**

[13] https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/
[14] http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971



35. Concerning the procedure employed in determining the dissemination of the statements made against Ms. Giuffre, nearly every major news site[15] that I investigated, along with other specific news sites in the United States, the United Kingdom, Canada, and Australia, as well as other countries, have carried some aspects of the overall story related to Ms. Giuffre and/or Ms. Maxwell, or other parties involved.

36. In fact, there are tens of thousands of news articles and postings concerning the general story from news outlets worldwide, with combined potential viewership in the multi-millions, as searches on the major search engines, such as Google and Bing, show.

[15] Including the largest online news sites, such as Yahoo! News, Google News, Huffington Post, CNN, NY Times, Fox News, NBC News, Daily Mail, Washington Post, The Guardian, Wall Street Journal, ABC News, BBC News, USA Today, LA Times (see http://www.ebizmba.com/articles/news-websites)

37. However, I was not interested in news articles that **just** discussed the story in general or other aspects of the story. Also, I was **not** interested in those articles where Ms. Maxwell or those acting on her behalf, such as Mr. Gow, would just generally deny the allegations in the complaint[16]. I was specifically interested in only those articles that referenced directly or quoted the statements made against Ms. Giuffre in the 2 January 2015 email message from Mr. Gow, Ms. Maxwell's subsequent confirmation of the statements, or similar statements as those in the message from Mr. Gow. Naturally, this narrow focus is a smaller subset of news articles than are the articles addressing the overall story.

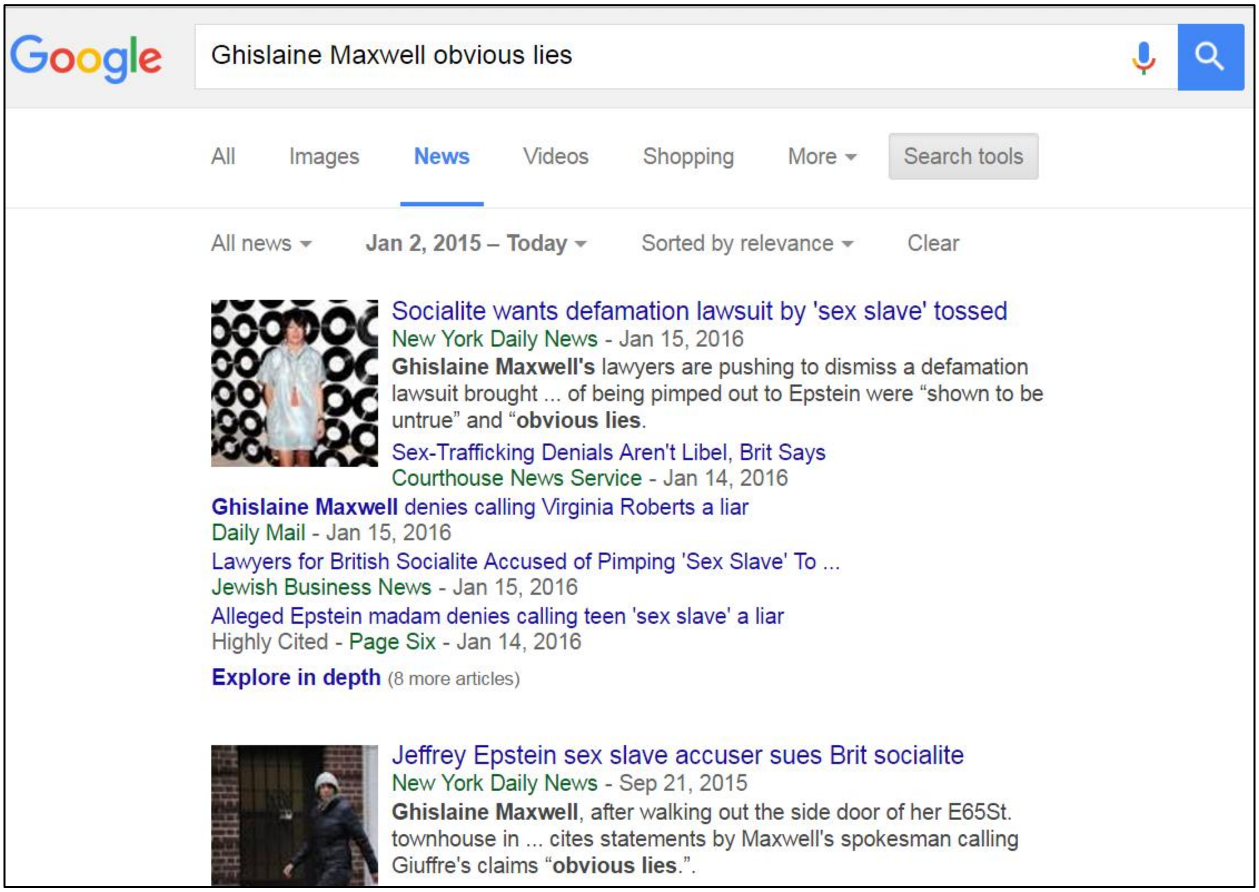
38. To isolate these articles of interest, I generated a series of 10 queries[17] that specifically targeted news articles from the case that addressed the statements made against Ms. Maxwell (e.g., *Ghislaine Maxwell obvious lies*) to retrieve a set of articles that directly related to the statements made against Ms. Giuffre[18]. I employed a modified snowball technique[19], starting with one seed query, adding and modifying terms, until I was not retrieving new results. I also located some articles via navigating from the set of retrieved articles.

39. I set the search range date from 2 January 2015 onward, so articles prior to that date were not included in the search results. For each article used in my analysis, I also verified the date that the article was published to ensure it was published on or after 2 January 2015 and that the articles directly referenced in some way the statements made against Ms. Giuffre.

40. An example of a search engine results page in response to one of these queries is shown in Figure 3.

[16] Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433.
[17] *Ghislaine Maxwell obvious lies*, *Ghislaine Maxwell Roberts obvious lies cnn*, *Ghislaine Maxwell Virginia Roberts*, *Giuffre Maxwell obvious lies*, *new york daily news alleged madam andrews*, *Prince Andrew Maxwell Roberts*, *Prince Andrew obvious lies*, *prince andrew's sex slave scandal who is maxwell*, *Ross Gow obvious lies, sex slave obvious lies*.
[18] In addition to the queries, I located some articles via direction navigation.
[19] https://en.wikipedia.org/wiki/Snowball_sampling

41. **Figure 3: Google News search results for the search *Ghislaine Maxwell obvious lies* with a date delimiter beginning on 2 January 2015.**



Google | Ghislaine Maxwell obvious lies

All | Images | News | Videos | Shopping | More | Search tools

All news | Jan 2, 2015 – Today | Sorted by relevance | Clear

Socialite wants defamation lawsuit by 'sex slave' tossed
New York Daily News - Jan 15, 2016
Ghislaine Maxwell's lawyers are pushing to dismiss a defamation lawsuit brought ... of being pimped out to Epstein were "shown to be untrue" and "**obvious lies**.
Sex-Trafficking Denials Aren't Libel, Brit Says
Courthouse News Service - Jan 14, 2016
Ghislaine Maxwell denies calling Virginia Roberts a liar
Daily Mail - Jan 15, 2016
Lawyers for British Socialite Accused of Pimping 'Sex Slave' To ...
Jewish Business News - Jan 15, 2016
Alleged Epstein madam denies calling teen 'sex slave' a liar
Highly Cited - Page Six - Jan 14, 2016
Explore in depth (8 more articles)

Jeffrey Epstein sex slave accuser sues Brit socialite
New York Daily News - Sep 21, 2015
Ghislaine Maxwell, after walking out the side door of her E65St. townhouse in ... cites statements by Maxwell's spokesman calling Giuffre's claims "**obvious lies**.".

42. I then personally verified that each article, by reviewing each article, used in my analysis directly referenced in some way the statements made against Ms. Giuffre.

43. So, articles relating to the overall story that did **not** mention Ms. Maxwell's statements made against Ms. Giuffre were **not** included in the analysis. Articles relating to the overall story that referred to Ms. Maxwell simply denying the charges were **not** included.

44. I also personally performed a site search[20] of the top 15 online media sites worldwide[21] of articles related to the case, and I reviewed the results to identify if any of these

[20] https://www.google.com/advanced_search
[21] Yahoo! News, Google News, Huffington Post, CNN, NY Times, Fox News, NBC News, Daily Mail, Washington Post, The Guardian, Wall Street Journal, ABC News, BBC News, USA Today, LA Times (see http://www.ebizmba.com/articles/news-websites)

articles referred to the statements against Ms. Giuffre. I also did the same for many country-specific news sites in the United States, the United Kingdom, Canada, and Australia.

45. In the end, I had a set of 178 online news and other articles from 2 January 2105 to the date that I filed this report that specifically referenced the statements made against Ms. Giuffre to conduct my analysis, as outlined below.

46. Each of these 178 online articles was posted online. The 178 online articles were distributed among 115 unique domain websites (i.e., some websites posted multiple articles that contain the statements made against Ms. Giuffre). These 115 domains are:

- http://beforeitsnews.com
- http://boltonbnp.blogspot.com
- http://businessnewsusa.org
- http://dukefmduluth.com
- http://dukefmfargo.com
- http://home.bt.com
- http://jewishbusinessnews.com
- http://jewishnews.timesofisrael.com
- http://kdal610.com
- http://kfgo.com
- http://motivatornews.com
- http://mrharrywales.tumblr.com
- http://muhammad-ali-ben-marcus.blogspot.com
- http://news.sky.com
- http://news.trust.org
- http://newsbite.it
- http://newstoday.club
- http://normanfinkelstein.com
- http://onewayempire.com
- http://pagesix.com
- http://planetinvestigations.com
- http://softwaresuites.ne
- http://thisviral.com
- http://townhall.com
- http://ugandansatheart.blogspot.com
- http://uk.reuters.com
- http://whatiswrongwiththispicture2012.blogspot.com
- http://whbl.com
- http://whtc.com

- http://wibqam.com
- http://wifc.com
- http://wincountry.com
- http://wkzo.com
- http://worlddailynews.info
- http://wsau.com
- http://wtaq.com
- http://wtvbam.com
- http://www.anorak.co.uk
- http://www.aol.co.uk
- http://www.asianimage.co.uk
- http://www.bailiwickexpress.com
- http://www.bannednews.net
- http://www.bbc.com
- http://www.belfasttelegraph.co.uk
- http://www.bournemouthecho.co.uk
- http://www.businessinsider.com
- http://www.business-standard.com
- http://www.capitalbay.news
- http://www.clactonandfrintongazette.co.uk
- http://www.courthousenews.com
- http://www.dailylife.com.au
- http://www.dailymail.co.uk
- http://www.dailyrecord.co.uk
- http://www.darkpolitricks.com
- http://www.dudleynews.co.uk
- http://www.eveningtimes.co.uk
- http://www.express.co.uk
- http://www.faceiraq.com
- http://www.ghanagrio.com
- http://www.ghanareview.com
- http://www.govtslaves.info
- http://www.headlines-news.com
- http://www.huffingtonpost.co.uk
- http://www.ibtimes.co.uk
- http://www.independent.ie
- http://www.infiniteunknown.net
- http://www.iol.co.za
- http://www.irishexaminer.com
- http://www.irishmirror.ie
- http://www.irishtimes.com
- http://www.itv.com
- http://www.lancashiretelegraph.co.uk
- http://www.lse.co.uk

- http://www.mgtowhq.com
- http://www.mirror.co.uk
- http://www.msn.com
- http://www.nationalenquirer.com
- http://www.newindianexpress.com
- http://www.newscopia.com
- http://www.newsday.com
- http://www.newsgrio.com
- http://www.nigeriadailynews.news
- http://www.nydailynews.com
- http://www.nzherald.co.nz
- http://www.oneworldofnations.com
- http://www.oxfordmail.co.uk
- http://www.pressreader.com
- http://www.reuters.com
- http://www.scmp.com
- http://www.scotsman.com
- http://www.somersetlive.co.uk
- http://www.srnnews.com
- http://www.swindonadvertiser.co.uk
- http://www.telegraph.co.uk
- http://www.theargus.co.uk
- http://www.theboltonnews.co.uk
- http://www.thedailybeast.com
- http://www.thetelegraphandargus.co.uk
- http://www.thetruthseeker.co.uk
- http://www.twimovies.news
- http://www.westernmorningnews.co.uk
- http://www.wirralglobe.co.uk
- http://www.yorkpress.co.uk
- http://www.yorkshirepost.co.uk
- https://blairzhit.wordpress.com
- https://bol.bna.com
- https://ca.news.yahoo.com
- https://circusbuoy.wordpress.com
- https://quartetbooks.wordpress.com
- https://thetruth24.info
- https://www.eveningtelegraph.co.uk
- https://www.theguardian.com
- https://www.thesun.co.uk
- https://www.yahoo.com
- http://ferddyjay.blogspot.com

47. As seen from the list of domains that have published articles or stories containing references to the statement made against Ms. Giuffre, many of these domains are those of major news organizations or sources, including AOL News, BBC, Huffington Post, International Business Times, Irish Times, MSN News, National Enquirer, New York Daily News, New Zealand Herald, Page Six, Radar Online, Reuters, The Daily Beast, The Daily Mail, The Express, The Guardian, The Mirror, The Sun, The Telegraph, Yahoo! News, etc.

48. I then used a variety of web analytics traffic services and other sources to get the unique daily visitor traffic for each of these domains. I used multiple services when available to verify the unique daily visitor traffic for each of these domains, as these traffic services may use different techniques to arrive at their traffic numbers.

49. In cases of conflicting unique daily visitor traffic numbers, I utilized the most conservative (i.e., smallest) number.

50. In cases where I determined I could not get unique daily visitor traffic numbers or the unique daily visitor traffic were not reliable, in my opinion, I did not include the unique daily visitor traffic numbers for that domain in the numbers. This usually occurred for the sites with a smaller number of daily visitors or sites with an extremely large number of daily visitors.

51. *Unique daily visitors* measure is an industry standard web analytics metric for measuring people that visit a website in a given day, also known as unique audience[22]. It is generally averaged out over multiple days with a given period, such as week or month, as there are normal daily fluctuations.

52. Table 1 shows the unique daily visitor traffic for the listed domains that posted articles or stories referencing the statements made against Ms. Giuffre and the associated unique

[22] http://digitalmeasurement.nielsen.com/files/metrics-guidelines.pdf

daily visitor traffic for each of those domains, along with number of articles containing the statements made against Ms. Giuffre posted on that site.

53. **Table 1: Domains that published articles or stories containing the statements made against Ms. Giuffre with the domain's number of unique daily visitors and the number of articles containing the statements made against Ms. Giuffre published on that domain from 2 January 2015 to the date that I filed this report[23].**

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
1	http://beforeitsnews.com	193,333	1
2	http://boltonbnp.blogspot.com[a]	-	1
3	http://businessnewsusa.org[a]	-	1
4	http://dukefmduluth.com[a]	-	1
5	http://dukefmfargo.com[a]	-	1
6	http://home.bt.com	800,000	1
7	http://jewishbusinessnews.com	5,000	2
8	http://jewishnews.timesofisrael.com[a]	-	1
9	http://kdal610.com	257	1
10	http://kfgo.com	1,600	1
11	http://motivatornews.com[a]	-	1
12	http://mrharrywales.tumblr.com[a]	-	1
13	http://muhammad-ali-ben-marcus.blogspot.com[a]	-	1
14	http://news.sky.com	523,333	2
15	http://news.trust.org[a]	-	1
16	http://newsbite.it[a]	-	1
17	http://newstoday.club[a]	-	1
18	http://normanfinkelstein.com	1,987	1
19	http://onewayempire.com[a]	-	1
20	http://pagesix.com	320,000	5
21	http://planetinvestigations.com[a]	-	1
22	http://softwaresuites.ne[a]	-	1
23	http://thisviral.com[a]	-	1
24	http://townhall.com	236,667	1
25	http://ugandansatheart.blogspot.com[a]	-	1
26	http://uk.reuters.com	153,333	1
27	http://whatiswrongwiththispicture2012.blogspot.com[a]	-	1

[23] Note: Some outlets, I was able to get self-reported visitor numbers, such as the https://www.theguardian.com.

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
28	http://whbl.com	12,252	1
29	http://whtc.com	1,207	1
30	http://wibqam.com[a]	-	1
31	http://wifc.com	990	1
32	http://wincountry.com	503	1
33	http://wkzo.com	573	1
34	http://worlddailynews.info[a]	-	1
35	http://wsau.com	2,653	1
36	http://wtaq.com[a]	-	1
37	http://wtvbam.com[a]	-	1
38	http://www.anorak.co.uk	7,150	1
39	http://www.aol.co.uk	423,333	2
40	http://www.asianimage.co.uk	1,293	1
41	http://www.bailiwickexpress.com	29,633	1
42	http://www.bannednews.net[a]	-	1
43	http://www.bbc.com	12,950,000	1
44	http://www.belfasttelegraph.co.uk[a]	-	1
45	http://www.bournemouthecho.co.uk[a]	-	1
46	http://www.businessinsider.com	3,866,667	1
47	http://www.business-standard.com[a]	-	1
48	http://www.capitalbay.news[a]	-	1
49	http://www.clactonandfrintongazette.co.uk	-	1
50	http://www.courthousenews.com	11,333	3
51	http://www.dailylife.com.au	80,000	1
52	http://www.dailymail.co.uk	14,276,667	6
53	http://www.dailyrecord.co.uk	145,048	3
54	http://www.darkpolitricks.com[a]	-	1
55	http://www.dudleynews.co.uk[a]	-	1
56	http://www.eveningtimes.co.uk	3,667	1
57	http://www.express.co.uk	1,686,667	1
58	http://www.faceiraq.com[a]	-	1
59	http://www.ghanagrio.com[a]	-	4
60	http://www.ghanareview.com[a]	-	1
61	http://www.govtslaves.info[a]	-	1
62	http://www.headlines-news.com[a]	-	1
63	http://www.huffingtonpost.co.uk	750,000	3
64	http://www.ibtimes.co.uk	1,380,000	3
65	http://www.independent.ie[a]	-	1
66	http://www.infiniteunknown.net	3,183	1
67	http://www.iol.co.za	233,333	1

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
68	http://www.irishexaminer.com[a]	-	1
69	http://www.irishmirror.ie	100,000	3
70	http://www.irishtimes.com	323,333	1
71	http://www.itv.com	1,026,667	2
72	http://www.lancashiretelegraph.co.uk[a]	-	1
73	http://www.lse.co.uk	70,000	1
74	http://www.mgtowhq.com[a]	-	1
75	http://www.mirror.co.uk	3,860,000	10
76	http://www.msn.com[b]	-	2
77	http://www.nationalenquirer.com	60,000	1
78	http://www.newindianexpress.com[a]	-	1
79	http://www.newscopia.com[a]	-	1
80	http://www.newsday.com	132,250	1
81	http://www.newsgrio.com	132,250	2
82	http://www.nigeriadailynews.news	16,236	4
83	http://www.nydailynews.com	2,100,000	6
84	http://www.nzherald.co.nz	686,667	1
85	http://www.oneworldofnations.com[a]	-	1
86	http://www.oxfordmail.co.uk[a]	-	1
87	http://www.pressreader.com	110,000	4
88	http://www.reuters.com	2,363,333	1
89	http://www.scmp.com[a]	-	1
90	http://www.scotsman.com	125,393	1
91	http://www.somersetlive.co.uk[a]	-	1
92	http://www.srnnews.com[a]	-	1
93	http://www.swindonadvertiser.co.uk	22,077	2
94	http://www.telegraph.co.uk	5,506,667	1
95	http://www.theargus.co.uk	59,281	3
96	http://www.theboltonnews.co.uk	40,000	2
97	http://www.thedailybeast.com	1,636,667	3
98	http://www.thetelegraphandargus.co.uk	46,667	1
99	http://www.thetruthseeker.co.uk	21,757	1
100	http://www.twimovies.news[a]	-	1
101	http://www.westernmorningnews.co.uk[a]	-	1
102	http://www.wirralglobe.co.uk[a]	-	3
103	http://www.yorkpress.co.uk[a]	-	1
104	http://www.yorkshirepost.co.uk[a]	-	1
105	https://blairzhit.wordpress.com[a]	-	1
106	https://bol.bna.com[a]	-	2
107	https://ca.news.yahoo.com[b]	-	1

No.	Domain	Domain Unique Visitor Traffic (Daily)	Number of Articles Published
108	https://circusbuoy.wordpress.com[a]	-	1
109	https://quartetbooks.wordpress.com[a]	-	1
110	https://thetruth24.info[a]	-	1
111	https://www.eveningtelegraph.co.uk[a]	-	2
112	https://www.theguardian.com	8,872,392	6
113	https://www.thesun.co.uk	1,496,667	1
114	https://www.yahoo.com[b]	-	1
115	http://ferddyjay.blogspot.com[a]	-	1
		66,909,965	178

[a] - Unique daily visitor traffic not available

[b] - Unique daily visitor traffic not verifiable

54. I used each domain's unique daily visitor count to calculate the dissemination of the articles containing the statements against Ms. Giuffre to various websites and potentially to visitors to that site (i.e., as visitors to the news sites, these individuals could have been exposed to the articles containing the statements made against Ms. Giuffre), using the unique daily visitor number only once for each domain, regardless whether that domain published more than one article referring to the statements made against Ms. Giuffre.

IX. RESULTS FOR ANALYSIS OF THE DISSEMINATION OF THE STATEMENTS MADE AGAINST MS. GIUFFRE

55. Based on my analysis as outlined above, my opinion is that the statements against Ms. Giuffre have been disseminated to at least 115 online media and other sites with 178 stories or articles with a combined 66,909,965 (more than 66 million) unique daily visitors traffic.

56. I note that for many of the 178 articles containing the statements made against Ms. Giuffre, one could get gist of the story of the article directly from the article headline. I point this out as it is well known that people skim online news sites[24], so titles such as these

[24] See for example: Aikat, D. News on the web: usage trends of an on-line newspaper. Convergence: The International Journal of Research into New Media Technologies 4, 4 (Dec. 1998), 94-110.

would have substantial impact on visitors to that site. Examples of such articles headlines (examples of actual headlines from the 178 articles) are:

- *British socialite to face Epstein accuser's defamation lawsuit*
- *Alleged Epstein madam denies calling teen 'sex slave' a liar*
- *Sex-Trafficking Denials Aren't Libel*, *Brit Says*
- *U.S. woman who claimed she was forced to have sex with Prince Andrew sues British socialite for denying that she recruited her to be a sex slave*
- *British 'madam' accused of recruiting teenage 'sex slave' Virginia Roberts for Prince Andrew's friend Jeffrey Epstein denies calling her a liar*
- *Ghislaine Maxwell denies calling Virginia Roberts a liar*
- *Bill Clinton Pedophile Sex Scandal: Socialite Denies Calling ENQUIRER Source A Liar*, *Woman files defamation suit against British publishing magnate*
- *Jeffrey Epstein sex slave accuser sues Brit socialite for defamation*
- *Lawyers for British socialite accused of pimping 'sex slave' to Jeffrey Epstein push to dismiss defamation lawsuit*.

57. This is a conservative estimate, and more likely than not, articles containing the statements made against Ms. Giuffre have been disseminated to more individuals.

X. WHY THE ESTIMATE IS LOW

58. This (66,909,965 individual unique daily traffic) is a conservative estimate, and it is more likely than not, the statements have received wider dissemination due to factors such as:

a. Although I spend considerable effort to locate published articles that contained the statements made against Ms. Giuffre, it is reasonable to assume that I have not located all such articles by the time of the submission of this report. So, there are possibly more

sites with articles containing the statements made against Ms. Giuffre that are not included in my calculations, which would increase the dissemination of the articles.

b. The focus of my analysis was the dissemination of online articles containing the statements made against Ms. Giuffre, and I examined only online sources and not print or broadcast media. Many of the media outlets that I did identify have consider print distribution[25], which are not included in my calculations, for example, such as:

- The Sun (print circulation) 1,741,838
- Daily Mail (print circulation) 1,562,361
- The Daily Telegraph (print circulation) 472,936
- The Times (print circulation) 402,752
- The Guardian (print circulation) 161,152

c. In my analysis, I did not attempt to measure face-to-face dissemination that may have occurred after individuals may have read articles containing the statements made against Ms. Giuffre, which would increase the count.

d. Naturally, I could not access certain online sources where the statements made against Ms. Giuffre may have been disseminated (e.g., email messages, social media messages, articles behind firewalls, etc.). Therefore, these numbers are not included in my calculations.

e. Also, there are possibly sites that have hosted articles containing the statements made against Ms. Giuffre where the articles have been removed. Therefore, they are not included in my calculations.

[25] www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-sharp-fall-in-traffic

f. For sites where one or more of the articles containing the statements made against Ms. Giuffre are posted but where I could not locate or not determine reliable daily unique visitor traffic, I have not included these sites in my calculations. There are 59 (of the 115 sites, 51.3%) where I could not get or not get verifiable traffic data. For example, the traffic numbers for the MSN News (Microsoft) and Yahoo! News are not separated by news and other services, such as search, so I did not include these in the number of people to which the articles containing the statements made against were disseminated.

g. I did not include the dissemination of the articles containing the statements made against Ms. Giuffre directly to social media platforms. However, many of the articles containing the statements made against Ms. Giuffre do include counts of the number of times that individuals shared the article to a social media networks, as shown in Table 2.

i. **Table 2: Number of social media shares by published article containing the statements made against Ms. Giuffre.**

Shares	Date	Domain
12576	2-Jan-15	https://www.theguardian.com
201	3-Jan-15	http://muhammad-ali-ben-marcus.blogspot.qa
1600	3-Jan-15	http://www.dailymail.co.uk
4000	3-Jan-15	http://www.dailymail.co.uk
130	3-Jan-15	http://www.huffingtonpost.co.uk
45	3-Jan-15	http://www.ibtimes.co.uk
6436	3-Jan-15	http://www.mirror.co.uk
55	4-Jan-15	http://newsbite.it
56	4-Jan-15	http://ugandansatheart.blogspot.com
1813	4-Jan-15	http://www.dailyrecord.co.uk
9	4-Jan-15	http://www.express.co.uk
560	4-Jan-15	http://www.huffingtonpost.co.uk
24	4-Jan-15	http://www.ibtimes.co.uk
54	4-Jan-15	http://www.ibtimes.co.uk
198	4-Jan-15	http://www.irishmirror.ie
198	4-Jan-15	http://www.mirror.co.uk
174	4-Jan-15	http://www.nigeriadailynews.news
51	4-Jan-15	http://www.nzherald.co.nz

Shares	Date	Domain
216	4-Jan-15	http://www.telegraph.co.uk
177	4-Jan-15	https://www.theguardian.com
193	4-Jan-15	https://www.theguardian.com
105	5-Jan-15	http://www.dailylife.com.au
192	5-Jan-15	http://www.dailyrecord.co.uk
7	5-Jan-15	http://www.mirror.co.uk
1052	5-Jan-15	http://www.mirror.co.uk
96	5-Jan-15	http://www.nydailynews.com
115	5-Jan-15	https://www.theguardian.com
45	6-Jan-15	http://www.dailymail.co.uk
17	8-Jan-15	http://www.nydailynews.com
114	10-Jan-15	http://www.dailymail.co.uk
1	10-Jan-15	http://www.infiniteunknown.net
1466	10-Jan-15	https://www.theguardian.com
1	13-Jan-15	http://whatiswrongwiththispicture2012.blogspot.qa
256	22-Jan-15	http://www.dailyrecord.co.uk
120	22-Jan-15	http://www.huffingtonpost.co.uk
319	22-Jan-15	http://www.irishmirror.ie
338	22-Jan-15	http://www.mirror.co.uk
21	1-Feb-15	http://www.mirror.co.uk
342	7-Feb-15	https://www.theguardian.com
107	21-Sep-15	http://www.nydailynews.com
33	22-Sep-15	http://www.dailymail.co.uk
205	22-Sep-15	http://www.mirror.co.uk
1	15-Jan-16	http://jewishbusinessnews.com
13	15-Jan-16	http://www.dailymail.co.uk
17	15-Jan-16	http://www.nationalenquirer.com
2	15-Jan-16	http://www.nydailynews.com
7	n.d.	http://www.govtslaves.info
33,758		

ii. As shown in Table 2, the articles containing the statements made against Ms. Giuffre have been shared 33,758 times, mostly on Facebook.

iii. Given that the median number of Facebook 'friends' is 200[26], this equates to a possible 6,751,600 individuals, in addition to the 33,758 individuals who originally shared

[26] http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/

the articles, to which the articles containing the statements made against Ms. Giuffre could have been disseminated, assuming these individuals are all unique and have not already read one of the articles.

iv. However, I did not include these social media shares in my calculations.

v. Since news article viewing follows a power law[27] distribution[28], there is no direct linear ratio of number of social media shares to readership. There is published research that does report average of views of an article on a news website and also average social media shares[29]. In a direct calculation with numbers from this article[30], 23 articles views per social media share, using 33,758 social media shares, this would be 776,434 article views. However, this ratio would vary by website, number of daily unique visitors, type of news article, time for accumulating shares, and possibly other factors. Plus, this number would not account for the people receiving the social media share that viewed the title, post, and snippet but did not click on the share to view the article on the website, thereby undercounting views of the articles.

vi. Also, given the topical nature of the underlying news story, one could expect **lower** social media sharing but **higher** article viewing, as people will tend to read articles on such topics privately but not share on social media[31]. So, I would expect the social media number itself to be an undercount.

h. I did not include articles that link to one of the articles containing the statements made against Ms. Giuffre in my calculations of dissemination. Unless the article

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[27] https://en.wikipedia.org/wiki/Power_law

[28] See for example, Tatar, A., de Amorim, M. D., Fdida, S., & Antoniadis, P. (2014). A survey on predicting the popularity of web content. Journal of Internet Services and Applications, 5(1), 1.

[29] See for example, Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). Characterizing the life cycle of online news stories using social media reactions. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM.

[30] Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). Characterizing the life cycle of online news stories using social media reactions. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM.

[31] See for example, Agarwal, D., Chen, B. C., and Wang, X. Multi-faceted ranking of news articles using post-read actions. In Proc. of CIKM, ACM (2012), 694-703.

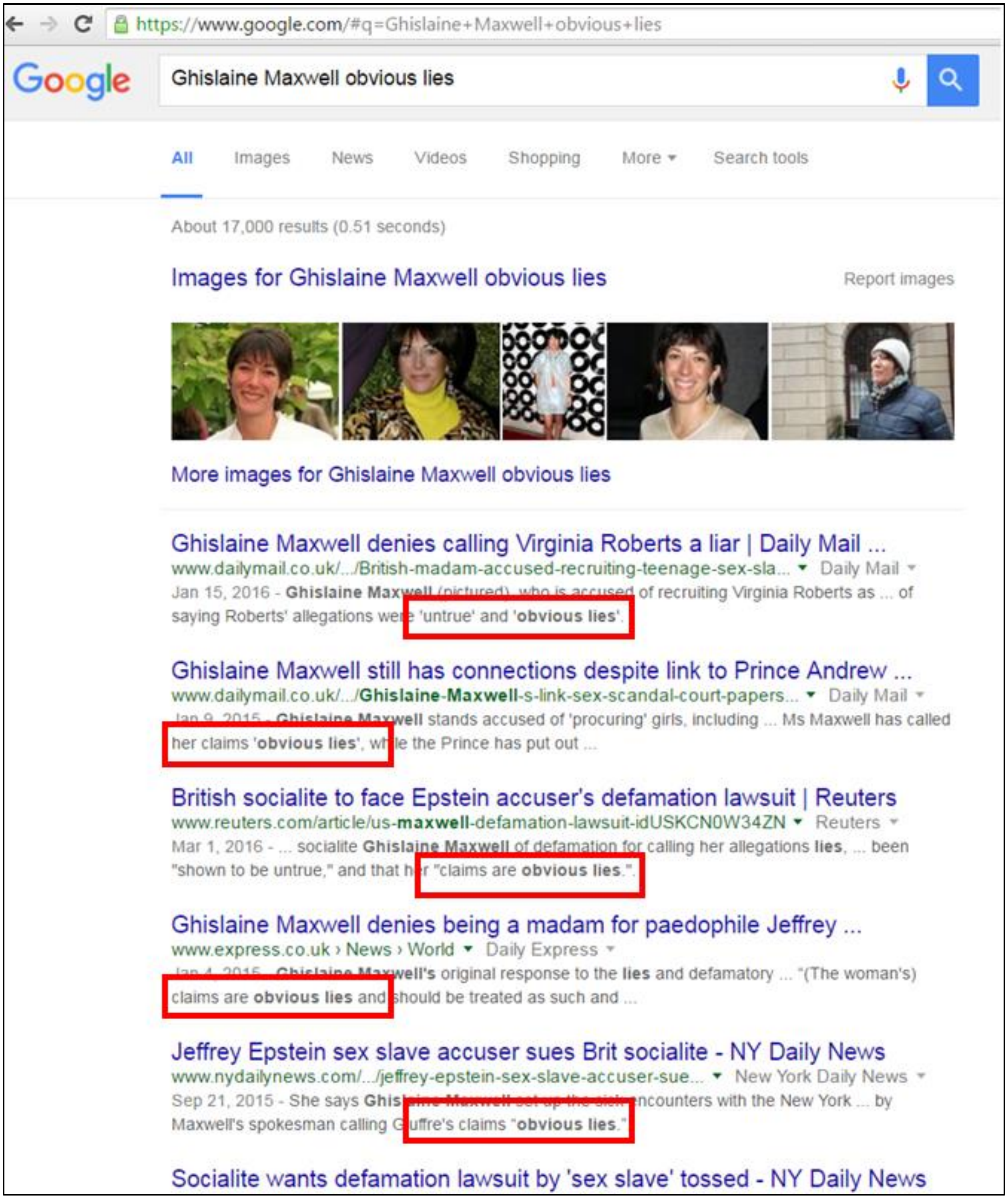
directly mentioned the statements made against Ms. Giuffre, I did not include that article in my calculations. So, unless the linking article actually mentioned, referenced, or quoted the statements made against Ms. Giuffre, I did not include it in the calculations.

i. Many sites published multiple articles on multiple days that quoted or referenced the statements made against Ms. Giuffre; however, I did not use these multiple publication dates from the same site in my calculations of unique visitor traffic. If a domain published only one article containing the statements against Ms. Giuffre, then I directly used the unique daily visitors number. If a domain published multiple articles concerning the statements against Ms. Giuffre, I did not count the traffic for the subsequent articles containing the statements made against Ms. Giuffre, even though research shows that repeat traffic to websites is generally only about 30%[32], meaning that 70% of the traffic would be unique. However, I was not comfortable using this figure given the natural of these sites, which might have higher repeat visitors day-to-day. Therefore, I did not include the unique visitors to multiple articles in my calculations.

j. Finally, I did not include the count of people who may been searching and may have seen the statements made against Ms. Giuffre in the search results, without needing to visit the actual articles, as shown in Figure 4.

k. **Figure 4: Example of search results with the statements made against Ms. Giuffre appearing in the result snippets, requiring no need to visit the articles themselves.**

[32] Teevan, J., Adar, E., Jones, R. and Potts, M. (2006). History repeats itself: repeat queries in Yahoo's logs. In *Proceedings of the 29th annual international ACM SIGIR conference on Research and development in information retrieval* (SIGIR '06). ACM, New York, NY, USA, 703-704.



https://www.google.com/#q=Ghislaine+Maxwell+obvious+lies

Google

Ghislaine Maxwell obvious lies

All Images News Videos Shopping More Search tools

About 17,000 results (0.51 seconds)

Images for Ghislaine Maxwell obvious lies — Report images

More images for Ghislaine Maxwell obvious lies

Ghislaine Maxwell denies calling Virginia Roberts a liar | Daily Mail ...
www.dailymail.co.uk/.../British-madam-accused-recruiting-teenage-sex-sla... ▾ Daily Mail ▾
Jan 15, 2016 - **Ghislaine Maxwell** (pictured), who is accused of recruiting Virginia Roberts as ... of saying Roberts' allegations were 'untrue' and '**obvious lies**'.

Ghislaine Maxwell still has connections despite link to Prince Andrew ...
www.dailymail.co.uk/.../**Ghislaine-Maxwell**-s-link-sex-scandal-court-papers... ▾ Daily Mail ▾
Jan 9, 2015 - **Ghislaine Maxwell** stands accused of 'procuring' girls, including ... Ms Maxwell has called her claims '**obvious lies**', while the Prince has put out ...

British socialite to face Epstein accuser's defamation lawsuit | Reuters
www.reuters.com/article/us-**maxwell**-defamation-lawsuit-idUSKCN0W34ZN ▾ Reuters ▾
Mar 1, 2016 - ... socialite **Ghislaine Maxwell** of defamation for calling her allegations **lies**, ... been "shown to be untrue," and that her "claims are **obvious lies**."

Ghislaine Maxwell denies being a madam for paedophile Jeffrey ...
www.express.co.uk › News › World ▾ Daily Express ▾
Jan 4, 2015 - **Ghislaine Maxwell's** original response to the **lies** and defamatory ... "(The woman's) claims are **obvious lies** and should be treated as such and ...

Jeffrey Epstein sex slave accuser sues Brit socialite - NY Daily News
www.nydailynews.com/.../jeffrey-epstein-sex-slave-accuser-sue... ▾ New York Daily News ▾
Sep 21, 2015 - She says **Ghislaine Maxwell** set up the sick encounters with the New York ... by Maxwell's spokesman calling Giuffre's claims "**obvious lies**."

Socialite wants defamation lawsuit by 'sex slave' tossed - NY Daily News

XI. ACCURACY OF THE TRAFFIC NUMBERS AND ADDITIONAL VERIFICATION

59. Concerning the accuracy of the analysis, the number of domains where the statements made against Ms. Giuffre have been disseminated is reliable, as this is straightforward to verify (i.e., the article is either posted on a site or it is not). If anything, this is an undercount, as some domains, for example, may have removed such articles, making them no longer available. There are possibly articles containing the statements that I have not been able to locate by the time that I submitted this report.

60. Concerning traffic numbers for domains, a unique visitor is typically identified by an identifier stored in a text file, which is based on an individual computer's browser, although more sophisticated methods are also being used. In locating traffic numbers for the domains, I used multiple services when available and attempted to verify via other sources. In case with varying traffic data, I utilized the most conservative (i.e., smallest) number available.

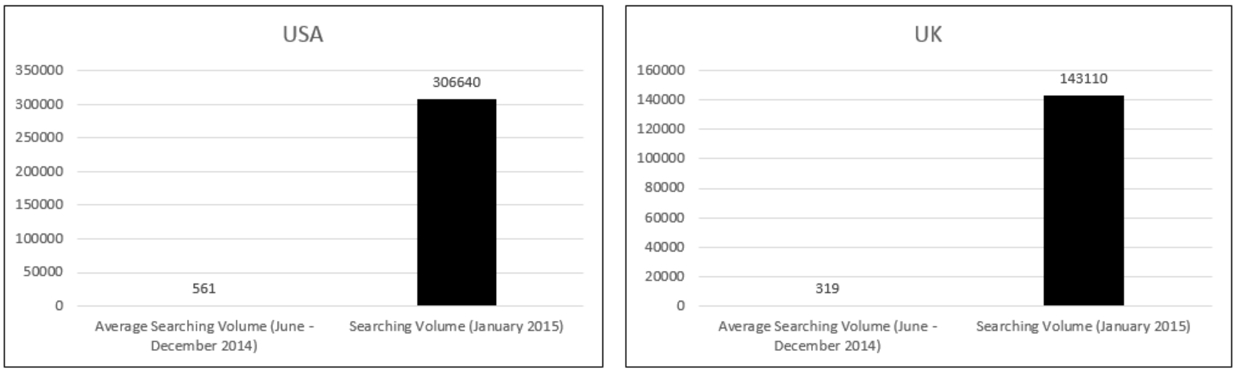
61. I also verified findings from my analysis via other methods and my own experience and training. For example, there are periods of increased publishing of articles containing the statements made against Ms. Giuffre and related stories. One would expect, increases in associated searching during these periods. Using the Google Keyword Tool, which provides search volume for search queries by month, I examined search volume from January 2015 to the date that I filed this report. There was an 54,518% increase in search volume for the keywords *Virginia Giuffre Virginia Roberts Ghislaine Maxwell* in January 2015, relative to the prior 7 months, in the US, and a 44,822% increase for the United Kingdom (UK) in January 2015, relative to the prior 7 months. This is in line with the increase in posting of articles during the same month[33]. So, one sees the expected increase in searching for key terms based on the increase posting of articles.

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[33] Note: I use the US and the UK as sample countries since there are aspect of the story that relate to each country.

62. Figure 5 shows increase in searching volume in January 2015 for the US and UK relative to the previous 7 months.

63. **Figure 5: Increase in search volume in January 2015 for the US and UK relative to the previous 7 months for the keyphrase *Virginia Giuffre Virginia Roberts Ghislaine Maxwell*.**



XII SUMMARY

64. **The statements made against Ms. Giuffre have been disseminated to at least 115 online media or other sites in 178 separate stories or articles with a combined 66,909,965 individual unique visitors from 2 January 2015 to the date that I filed this report, inclusive. More likely than not, this is a conservative estimate.**

65. Right to Amend: Although I have had access to materials publicly available pertaining to claims in this dispute, I have not been able to review all the material by the deadline for completion of this report. I reserve the right to review and rely on any such material, including at the time of trial. I also reserve the right to issue a supplemental or an amended report if my review of such material results in any significant change or addition to my opinion.

Respectfully submitted,

DATED: 09 September 2016

By____

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Appendix A Curriculum Vitae



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Affiliate Appointment, Department of Computer Science and Engineering, The Pennsylvania State University

Affiliate Appointment, Department of Industrial and Manufacturing Engineering, The Pennsylvania State University

Director, Information Searching and Learning Laboratory, College of Information Sciences and Technology (ISL^2), The Pennsylvania State University

Current Advisory Boards

- The Pennsylvania Technical Assistance Program (PennTAP) (http://penntap.psu.edu/)
- CLAK Impressions (http://www.linkedin.com/company/clak-impressions)
- Innoblue (http://www.linkedin.com/company/innoblue)

Research

Research Goal: Increase the effectiveness and efficiency for accomplishing information tasks by improving the interaction among people, information, and technology

Research Interests:
I study the uses and affordances of the Web for information searching and ecommerce, with a focus on interactions among the person, information, and technology. Current active research areas are **Web searching**, **information retrieval**, **keyword advertising**, **online marketing**, and **online social networking** within the ecommerce domain.

- **Sponsored search** and **keyword advertising**
- **Social media** as an information source
- **Information searching** and **Web information retrieval**

Short Bio:
Jim has authored or co-authored **250 or so research publications**, with articles appearing in a multi-disciplinary and extremely wide range of journals and conferences. He is author of the book, Understanding Sponsored Search: A Coverage of the Core Elements of Keyword

Research

Advertising (Cambridge University Press), author of the book Understanding User - Web Interactions Via Web Analytics, co-author of the book, Web Search: Public Searching of the Web, and co-editor of the book Handbook of Research on Weblog Analysis.

Jim is a full professor with the College of Information Sciences and Technology at **The Pennsylvania State University** and a Principal Scientist in the social computing group of the **Qatar Computing Research Institute, Hamad bin Khalifa University**. He is a graduate of **West Point** and has a PhD in computer science from **Texas A&M University**, along with master degrees from **Texas A&M** (computer science) and **Troy State** (international relations).

Jim is **editor-in-chief** of the journal, Information Processing & Management (Elsevier), a member of the editorial boards of seven international journals, former editor-in-chief of the journal, Internet Research (Emerald), and he has served on the research committee for the Search Engine Marketing Professional Organization (SEMPO). He has received **several awards and honors**, including an ACM Research Award and six application development awards, along with other writing, publishing, research, teaching, and leadership honors.

He has served as a Senior Fellow at the **Pew Research Center** with the Pew Internet and American Life Project and a university expert with the **National Ground Intelligence Center**. He is a Principle Scientist at the Qatar Computing Research Institute.

He has done several **consulting projects** (log analysis, statistical analysis) and **expert witnesses** cases (patent litigation, civil litigation, and class action suits) in the areas of keyword advertising, web analytics, co-registration, domain parking, webpage access, webpage history, and online advertising click fraud.

Education

Ph.D. Computer Science, August 1999 - May 1996
Texas A&M University, College Station, Texas 77843
Dissertation: A Software Agent for Performance Improvement of an Existing Information Retrieval System
Advisor: Dr. Udo Pooch

M.CS. Computer Science, May 1996 - June 1994
Texas A&M University, College Station, Texas 77843
Research Area: Network Performance and Monitoring

M.S. International Relations, August 1994 - June 1992
Troy State University, European Division
Research Thesis: National Competitive Advantage

B.S. Computer Science, May 1985 - June 1981
United States Military Academy, West Point, New York 10996
Engineering Sequence: Electrical Engineering

Academic Appointments

Current - 2014	**Full Professor**, College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA.
Current - 2015	**Principal Scientist**, Qatar Computing Research Institute (QCRI), Hamad Bin Khalifa University, Doha, Qatar
2014 - 2011	**University Researcher,** National Ground Intelligence Center, 2055 Boulders Road, Charlottesville, VA 22911
2014 - 2009	**Associate Professor**, College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA.
2012 - 2010	**Senior Fellow, Pew Internet and American Life Project, Pew Research Center, 1615 L Street, NW Suite 700 Washington, DC 20036**
2009 - 2003	**Assistant Professor**, College of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA. (Previously, School of Information Sciences and Technology)
2003 - 2001	**Instructor**, School of Information Sciences and Technology, The Pennsylvania State University, University Park, PA, 16802, USA
2000 - 1999	**Lecturer**, Computer Science Program, University of Maryland (Asian Division), Seoul, 104-022, Republic of Korea
1999 - 1998	**Assistant Professor**, Department of Electrical Engineering and Computer Science, United States Military Academy, West Point, New York, 10996
1998 - 1996	**Lecturer**, Department of Electrical Engineering and Computer Science, United States Military Academy, West Point, New York, 10996, USA.

Honors and Awards

2016 **2016 President's Award for Engagement with Students**, The Pennsylvania State University, University Park, Pennsylvania.

2015 **Best Paper**: Liu, Z. and **Jansen, B. J.** (2015) *Subjective versus Objective Questions: Perception of Question Subjectivity in Social Q&A*. 2015 International Conference on Social Computing, Behavioral-Cultural Modeling, and Prediction (SBP15). Washington DC, p. 131-140. 31 Mar.-3 Apr.

2011 **Teaching and Learning with Technology Fellow** at Penn State (May 2011 – May 2012). Teaching research fellowship to develop subject-based learning apps that leverage cellular technology, the contextual (location-aware) attributes of mobile technology, and social media. See tlt.its.psu.edu/2011/07/24/jim-jansen/

Honors and Awards

2011 **Paper Award**: The article, *The Seventeen Theoretical Constructs of Information Searching and Information Retrieval*, published in Journal of the American Society for Information Science and Technology selected as **John Wiley Best JASIST Paper Award 2011** (see http://www.asis.org/awards/jasis_paper.html).

2010 Emerald Literati Network **2010 Award for Excellence for Outstanding Reviewer** for the journal Internet Research (http://info.emeraldinsight.com/authors/literati/index.htm)

2008 **Best Paper**, Jansen, B. J., Zhang, M., and Schultz, C. (2008) *The Effect of Brand on the Evaluation of IT System Performance*. Proceedings of the Southern Association for Information Systems Conference, Richmond, VA, USA 13-15 March 2008

2008 Presented with a **Google Faculty Research Award** ($50,000)

2007 Article selected as **Highly Commended Winner** at the Emerald Literati Network Awards for Excellence 2007. Spink, A. and Jansen, B. J. *(2006) Searching multiple federate content Web collections*, Online Information Review. 30(5), 485-495.

2004 Worldwide press coverage for book Web Search: Public Searching of the Web, co-authored with Dr. Amanda Spink. Including AP, Yahoo! News, CNN, MSN, and numerous other television, radio, Web, and print outlets.

2003 Worldwide press coverage and interviews 6/30/2003-7/3/2003 reference article: Jansen, B. J., and Spink, A. (2003) *An analysis of Web pages retrieved and viewed*, IC'03: Internet Computing: Web Mining Session, Las Vegas, 4-6 June, 2003. Including: BBC, Irish Radio, Washington Times, Psychology Today, and several U.S. radio stations.

2003 **ISI Most Highly Cited Articles in Field of Web Searching** for the manuscript Jansen, B. J., Spink, A., and Saracevic, T. (2000) *Real Life, Real Users, and Real Needs: A Study and Analysis of User Queries on the Web*, Information Processing & Management. 38(2), 207-227.

The article was identified in May 2003 by ISI Essential Science Indicators to be one of the most cited papers in the research area of Web Searching Behavior.

2002 **Highly Commended Article** invited for journal publication. Jansen, B. J. (2002) *Towards Implementing a Cognitive Model of Searching*, Proceedings of the E-Learning 2002 Conference (Web Track), Montreal, Canada. 15-19 October.

2002 **Two Crystal Awards of Excellence** for outstanding software development in the communications field.

Honors and Awards

2002 Worldwide press coverage and interviews 3/31/02- 4/5/02 reference article: Spink, A., Jansen, B. J., Wolfram, D., and Saracevic, T. (2002). *From e-sex to e-commerce: Web search changes*, IEEE Computer, *35*(3), 133-135.

Including: Associated Press, BBC, CBC, MSNBC, Wall Street Journal, New York Times, PC World, CNN, Chinese People's Daily, Toronto Star, US News and World Report, San Francisco Chronicle, The Independent (UK), Business Week, Washington Post, Financial Times (UK), Information Week, Web, TV, newspaper (200+) and magazine media.

2002 **Award of Distinction** for interactive Web site development.

2002 **Two Awards of Excellence** for exceptional multimedia application development.

2002 US Army War College **Team of the Year** for outstanding contributions as team manager.

2001 **U.S. Army Visual Information Award** for multimedia development.

2000 **Highly Commended Award** by MCB Publishers, for: Spink, A., Bateman, J., and Jansen, B. J. (1999) *Searching the Web: A survey of Excite users*, Journal of Internet Research: Electronic Networking Applications and Policy, 9(2), 117-128.

1998 **Top Paper Award** for: Spink, A., Bateman, J., and Jansen, B. J. (1998) *Users' searching behavior on the Excite Web search engine*, 1999 World Conference on the WWW and Internet, Orlando, Florida.

1997 **ACM Student Research Award** for: Jansen, B. J. (1997) *Simulated Annealing for Query Results Ranking*, Computer Science Education Conference, San Jose, CA. 28 – 30 February.

1992 **Writing and Research Award**, U.S. Marine Corps University.

1992 **Research Award** from U.S. Army Trainer Journal

Books

Jansen, B. J. (2011). Understanding Sponsored Search: Coverage of the Core Elements of Keyword Advertising. Cambridge University Press: Cambridge, UK.

Jansen, B. J. (2009) Understanding User – Web Interactions via Web Analytics. Morgan-Claypool Lecture Series. Marchionini, G. (Ed). Morgan-Claypool: San Rafael, CA.

Jansen, B. J., Spink, A., and Taksa, I. Editors. (2009) Handbook of Research on Web Log Analysis, Hershey, PA: Idea Group Publishing.

Books

Spink, A., and **Jansen, B. J.** (2004) Web Search: Public Searching of the Web, Dordrecht: Kluwer Academic Publishers.

Parts of Books

Jansen, B. J. (2016) *Log Analysis*. Research Methods in Library and Information Science. Libraries Unlimited.

Mukherjee, P, Kozlek, B., Gyorke, A., Camplese, C. and **Jansen, B. J.** (2014) *Leveraging Mobile Technology to Enhance Both Competition and Cooperation in an Undergraduate STEM Course*. Innovative Practices in Teaching Information Sciences and Technology: Experience Reports and Reflections. p. 167-178. New York: Springer.

Reddy, M. C., **Jansen, B. J.**, Spence, P. R. (2010) *Collaborative Information Behavior: Exploring Collaboration and Coordination During Information Seeking and Retrieval Activities*. Foster, J. (Ed.), Collaborative Information Behavior: User Engagement and Communication Sharing. p. 73 - 88. Hershey, PA: IGI.

Booth, D., and **Jansen, B. J.** (2009) *A review of methodologies for analyzing Websites*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), Handbook of Web Log Analysis. p. 143-164. Hershey, PA: IGI.

Jansen, B. J. (2009) *The methodology of search log analysis*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), Handbook of Web log analysis. p. 100-123. Hershey, PA: IGI.

Jansen, B. J., Taksa, I., and Spink, A. (2009) *Research and methodological foundations of transaction log analysis*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), Handbook of Web Log Analysis. p. 1-17. Hershey, PA: IGI.

Rainie, L., and **Jansen, B. J.** (2009) *Surveys as a complementary method to Web log analysis*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), Handbook of Web Log Analysis. p. 39-64. Hershey, PA: IGI.

Taksa, I., Spink, A., and **Jansen, B. J.** (2009) *A review of methods in presented in the handbook of weblog analysis*. In B. J. Jansen, A. Spink & I. Taksa (Eds.), Handbook of Web Log Analysis. p. -358. Hershey, PA: IGI.

Zhang, M., and **Jansen, B. J.** (2009) *Using action-object pairs as a conceptual framework for transaction log analysis*. In B. J. Jansen, A. Spink & Taksa, I. (Eds.), Handbook of Web Log Analysis. p. 416-435. Hershey, PA: IGI.

Jansen, B. J. and Spink, A. (2008) *Logfile analysis*. In International Encyclopedia of Communication. Editors: Robin Mansell. Oxford: Blackwell Press. 6. p. 2730-2734.

Parts of Books

Jansen, B. J. and Spink, A. (2008) *How to Define Searching Sessions on Web Search Engines*. In Lecture Notes in Artificial Intelligence, LNAI 4198, Advances in Web Mining and Web Usage Analysis. Editors: Olfa Nasraoui, Osmar Zaiane, Myra Spiliopoulou, Bamshad Mobasher, Philip Yu, Brij Masand. p. 92 – 109. Berlin Heidelberg: Springer-Verlag.

Jansen, B. J., Berkheiser, W, Spink, A., and Pedersen, J. (2007) *How people search for governmental information on the Web*. In: Encyclopedia of Digital Government. Editors: Ari-Veikko Anttiroiko and Matti Malkia. p. 933-939. Hershey, PA: Idea Group Publishing.

Wolfe, R., **Jansen, B. J.**, and Spink, A. (2006) *Semantics and the medical Web: A review of barriers and breakthroughs in effective healthcare query*. In: Advances in Electronic Business. Vol. II. Editors: E. Li and D.C. Timon. p. 267-279. Hershey, PA: Idea Group Publishing.

Jansen, K. J., Corley, K. G., and **Jansen, B. J.** (2006) *E-Survey methodology: A review, issues, and implications*. In Encyclopedia of Electronic Surveys and Measurements (EESM)U. Editors: Jason D. Baker and Robert Woods. p. 1-8. Hershey, PA: Idea Group Publishing.

Jansen, B. J. and Spink, A. (2004) *An analysis of documents viewing patterns of Web search engine users*, In Web Mining: Applications and Techniques. Editor: Anthony Scime. p. 339-354. Hershey, PA: Idea Group Publishing.

Jansen, B. J. (2004) *The use of query operators and their effect on the results of Web search engines*, In Issues of Human Computer Interaction. Editor: Dr. Anabela Sarmento. p. 50-72. Hershey, PA: Idea Group Publishing.

Refereed Journal Articles

Coughlin, D. and **Jansen, B. J.** (2016) *Modeling Journal Bibliometrics to Predict Downloads and Inform Purchase Decisions at University Research Libraries*. Journal of the Association for Information Science and Technology.

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Liu, Z., and **Jansen, B. J.** (2016) *Understanding and Predicting Question Subjectivity in Social Question and Answering*. IEEE Transactions on Computational Social Systems. 3(1), 32-41.

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Mukherjee, P, Kozlek, B., **Jansen, B. J.**, Gyorke, A., and Camplese, C. (2014) *Designing a Mobile and Socially Networked Learning Assistant for a University-level Keyword Advertising Course*. MERLOT Journal of Online Learning and Teaching. 10(3), 351-373.

Yang, Y., Qin, R., Zhang, J., Zeng, D., and **Jansen, B. J.** (2014) *Budget Planning for Coupled Campaigns in Sponsored Search*. International Journal of Electronic Commerce. 18(3), 39-66.

Mukherjee, P. and **Jansen, B. J.** (2014) *Performance Analysis of Keyword Advertising Campaign Using Gender-Brand Effect of Search Queries*. Electronic Commerce Research and Applications. 13(2), 139–149.

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Jansen, B. J., Moore, K., and Carman, S. (2013) *Evaluating The Performance of Demographic Targeting Using Gender in Keyword Advertising*. Information Processing & Management. 49(1), 286-302.

Jansen, B. J., Zhang, L, and Mattila, A. S. (2012) *Investigating Brand Knowledge of Web Search Engines: User Reactions to Search Engine Logos*. Electronic Commerce Research. 12(4), 429-454.

Zhang, L, **Jansen, B. J.**, Mattila, A. S. (2012) *A Branding Model for Web Search Engines*. International Journal of Internet Marketing and Advertising. 7(3), 195 – 216.

Ortiz-Cordova, A. and **Jansen, B. J.** (2012) *Classifying Web Search Queries in Order to Identify High Revenue Generating Customers*. Journal of the American Society for Information Science and Technology. 63(7), 1426 – 1441.

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Jansen, B. J., Sobel, K. and Cook, G. (2011) *Classifying Ecommerce Information Sharing Behaviour by Youths on Social Networking Sites.* Journal of Information Science. 37(2), 120-136.

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Kuthuria, A., **Jansen, B. J.**, Hafernik, C. (2010) *K-means Clustering to Determine User Intent of Web Queries*. Journal of Internet Research: Electronic Networking Applications and Policy. 20(5), 563-581.

Rosso, M. A. and **Jansen, B. J.** (2010) *Brand Names as Keywords in Sponsored Search Advertising*. Communications of the Association for Information Systems. 27(1), Article 6. Available at: http://aisel.aisnet.org/cais/vol27/iss1/6

JASIST Best Paper

Jansen, B. J., and Rieh, S. (2010) *The Seventeen Theoretical Constructs of Information Searching and Information Retrieval*. Journal of the American Society for Information Science and Technology. 61(8), **1517-1534**.

Jansen, B. J., Tapia, A. H., and Spink, A. (2010) *Searching for salvation: An analysis of US religious searching on the World Wide Web,* Religion. 40(1), 39-52.

Highly Cited

Jansen, B. J., Zhang, M, Sobel, K, and Chowdury, A. (2009) *Twitter Power: Tweets as Electronic Word of Mouth*. Journal of the American Society for Information Science and Technology. 60(11), 2169-2188.

Recognized as one of the **top 10 most highly cited papers in JASIST** published since 2001 http://www.asis.org/Bulletin/Aug-12/AugSep12_Bar-Ilan.html

Jansen, B. J., Booth, D. and Smith, B. (2009) *Using the taxonomy of cognitive learning to model online searching*. Information Processing & Management. 45(6), 643-663.

Tjondronegoro, D., Spink, A., and **Jansen, B. J.** (2009) *A Study and Comparison of Multimedia Web Searching: 1997-2006*. Journal of the American Society for Information Science and Technology. 60(9), **1756-1768.**

Jansen, B. J., Zhang, M., and Schultz, C. (2009). *Search engine brand and the effect on user perception of searching performance*. Journal of the American Society for Information Science and Technology. 60(8), **1572-1595.**

Flaherty, T. B., **Jansen, B. J.**, Hofacker, C., and Murphy, J. (2009). *Insights on the Google Online Marketing Challenge and Its Successful Classroom Implementation*. Journal of Online Learning and Teaching, *5*(2), 446-457.

Refereed Journal Articles

Jansen, B. J., Booth, D. L., and Spink, A. (2009). *Patterns of query modification during Web searching*. Journal of the American Society for Information Science and Technology. **60(7),** 1358-1371.

Jansen, B. J., Flaherty, T.B., Baeza-Yates, R., Hunter, L., Kitts, B., and Murphy, J. (2009). *The Components and Impact of Sponsored Search*. IEEE Computer. 42(5) 98-101.

Rosso, M., McClelland, M. K., **Jansen, B. J.**, and Fleming, S. W. (2009) *Using Google AdWords in the MBA MIS Course*. Journal of Information System Education. 20(1), 41-50.

Zhang, Y., **Jansen, B. J.**, and Spink, A. (2009) ***Identification of factors predicting clickthrough in Web searching using neural network analysis.*** *Journal of the American Society for Information Science and Technology. 60(3),* **557-570.**

Zhang, Y., **Jansen, B. J.**, and Spink, A. (2009) *Time Series Analysis of a Web Search Engine Transaction Log*, Information Processing & Management. 45(2), 230-245.

Jansen, B. J. and Spink, A. (2009) *Investigating Customer Click through Behavior with Integrated Sponsored and Non-Sponsored Results*, International Journal of Internet Marketing and Advertisement, 5(1/2), 74-94.

Jansen, B. J., Ciamacca, C., and Spink, A. (2008) *An Analysis of travel searching on the Web,* Journal of Information Technology and Tourism. 10(2), 101-118.

Jansen, B. J. and Mullen, T. (2008) *Sponsored search: An overview of the concept, history, and technology,* International Journal of Electronic Business. 6(2), 114 – 131.

Spink, A., and **Jansen, B. J.** (2008) *Trends in searching for business and e-commerce information on Web search engines,* International Journal of Electronic Commerce. 9(2), 154-161.

Highly Cited

Jansen, B. J., Booth, D., and Spink, A. (2008) *Determining the informational, navigational, and transactional intent of Web queries,* Information Processing & Management. 44(3), 1251-1266.

The most cited article in IP&M published since 2008 (http://www.journals.elsevier.com/information-processing-and-management/most-cited-articles/)

Jansen, B. J. (2008) *Searching for digital Images on the Web,* Journal of Documentation. 64(1), 81-101.

Jansen, B. J. and Eastman, C. (2008) *Limitations of advanced searching techniques on Web search engines,* Journal of Electronic Resources in Law Librarianship. 1(1), 55-81.

Refereed Journal Articles

Highly Cited

Reddy, M. C. and **Jansen, B. J.** (2008) *A model for understanding collaborative information behavior in context: A study of two healthcare teams,* Information Processing & Management. 44 (1), 256-273.

One of the Top 25 most cited articles in IP&M published since 2008 (http://www.journals.elsevier.com/information-processing-and-management/most-cited-articles/)

Jansen, B. J., Zhang, M., and Spink, A. (2007) *Patterns and transitions of query reformulation during Web searching,* International Journal of Web Information Systems. 3(4), 328-340.

Jansen, B. J., Brown, A., and Resnick, M. (2007) *Factors relating to the decision to click-on a sponsored link,* Decision Support Systems. 44(1), 46-59.

Jansen, B. J. and Spink, A. (2007) *Sponsored search: Is money a motivator for providing relevant results?*, IEEE Computer. 40(8), 50-55.

Jansen, B. J. (2007) *Click fraud.* IEEE Computer. 40(7), 85-86.

Jansen, B. J. (2007) *The comparative effectiveness of sponsored and non-sponsored results for Web ecommerce queries*, ACM Transactions on the Web. 1(1), Article 3.

Jansen, B. J., Spink, A., Blakely, C., and Koshman, S. (2007) *Defining a session on Web search engines*, *Journal of the American Society for Information Science and Technology. 58(6), 862-871.*

Jansen, B. J., Spink, A., and Koshman, S. (2007) *Web searcher interactions with the Dogpile.com meta-search engine*, *Journal of the American Society for Information Science and Technology. 58(5), 744-755.*

Jansen, B. J., Mullen, T., Spink, A., and Pederson, J. *(2006) Automated gathering of Web information: An in-depth examination of agents interacting with search engines*, ACM Transactions on Internet Technology. 6(4), 442-464.

Jansen, B. J. and Resnick, M. *(2006) An examination of searcher's perceptions of non-sponsored and sponsored links during ecommerce Web searching*, *Journal of the American Society for Information Science and Technology. 57(14),* **1949-1961.**

Koshman, S. Spink, A., **Jansen, B. J.**, Park, M., and Fields, C. *(2006) Web Searching on the Vivisimo search engine,* *Journal of the American Society for Information Science and Technology. 57(14),* **1875-1887**.

Spink, A., **Jansen, B. J.**, Blakely, C., and Koshman, S. *(2006) Overlap among major search engines,* Journal of Internet Research: Electronic Networking Applications and Policy. 16(4), 419-426.

Refereed Journal Articles

Jansen, B. J. *(2006) Search log analysis: What is it; what's been done; how to do it,* Library and Information Science Research, 28(3), 407-432.

Paper Award

Spink, A., and **Jansen, B. J.** *(2006) Searching multiple federate content Web collections,* Online Information Review. 30(5), 485-495.

Spink, A., Partridge, H., and **Jansen, B. J.** *(2006) Sexual/pornographic Web searching: Trends analysis,* First Monday. 11(9). http://www.firstmonday.org/issues/issue11_9/spink/index.html.

Jansen, B. J. *(2006) Paid search,* IEEE Computer. 39(7), 88-90.

Spink, A., **Jansen, B. J.**, Blakely, C., and Koshman, S. *(2006) A study of results overlap and uniqueness among major Web search engines,* Information Processing & Management. 42(5), 1379-1391.

Jansen, B. J. *(2006) Using temporal patterns of interactions to design effective automated searching assistance systems,* Communications of the ACM. 49(4), 72-74.

Jansen, B. J. *and Molina, P. (2006) The effectiveness of Web search engines for retrieving relevant ecommerce links,* Information Processing & Management. 42(4), 1075-1098.

Jansen, B. J. *and McNeese, M. D.* (2005) *Evaluating the effectiveness of and patterns of interactions with automated assistance in IR systems,* *Journal of the American Society for Information Science and Technology*. **56(14), 1480-1503.**

Most Accessed

Jansen, B. J. and Spink, A. (2005) *How are we searching the World Wide Web?: An analysis of nine search engine transaction logs,* Information Processing & Management. 42(1), 248-263.

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Spink, A., Park, M., **Jansen, B. J.**, and Pedersen, J. (2005) *Multitasking during Web search sessions,* Information Processing & Management. *42(1), 264-275.*

Jansen, B. J., Jansen, K. J., and Spink, A. (2005) *Using the Web to look for work: Implications for online job seeking and recruiting,* Journal of Internet Research: Electronic Networking Applications and Policy. 15(1), 49-66.

Jansen, B. J., Spink, A, and Pederson, J. (2005) *Trend analysis of AltaVista Web searching,* *Journal of the American Society for Information Science and Technology*. 56(6), 559-570.

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Jansen, B. J., Spink, A., and Pederson, J. (2005) *The effect of specialized multimedia collections on Web searching*, Journal of Web Engineering. 3(3/4), 182-199.

Spink, A. and **Jansen, B. J.** (2005) *A study of Web search trends*, Webology. **1**(2), Article 4, Available at: http://www.webology.ir/2004/v1n2/a4.html.

Jansen, B. J. and Spink, A. (2004) *An analysis of Web searching by European Alltheweb.com users*, Information Processing & Management. 41(2), 361-381.

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Spink, A., Yang, Y., **Jansen, B. J.**, Nvkanen, P., Ozmutlu, S., and Ozmutlu, C. (2004) *Medical and health Web searching: an exploratory study*, Health Information and Libraries Journal. 21(1), 44-51.

Jansen, B. J. and Pooch, U. (2004) *Improving IR system performance using software integration*, Journal of Internet Research: Electronic Networking Applications and Policy. 14(1), 19-33.

Spink, A., Koricich, A., and **Jansen, B. J.** (2004) *Sexual searching on Web search engines*, Cyber-psychology and Behavior. 7(1), 65-72.

Eastman, C. and **Jansen, B. J.** (2003) *Coverage, relevance, and ranking: the impact of query operators on Web search engine results*, ACM Transactions on Information Systems. 21(4), 383-411.

Spink, A., **Jansen, B. J.**, Wolfram, D., and Saracevic, T. (2002) *From e-sex to e-commerce: Web search changes*, IEEE Computer. 35(3), 107-111.

Wolfram, D., Spink, A., **Jansen, B. J.**, and Saracevic, T. (2001) *Vox populi: The public searching of the Web*, Journal of the American Society for Information Science and Technology. 52(12), 1073-1074.

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Jansen, B. J., *Spink, A.*, and Pederson, J. *(2003) Monsters at the Gates: When Softbots Visit Web Search Engines, Proceedings of the 4th International Conference on Internet Computing, Lap. p. 620–626. Vegas, Nevada. 23-26 June.*

Spink, A., Abbas, M., and **Jansen, B. J.** (2003) *Accessing E-commerce Web Information: Implications for Bridging the Digital Divide*, The 2003 Canadian Association for Information Science Conference, *p. 213-221.* Halifax, CA. 28 May-1 June.

Jansen, B. J. *and Spink, A. (2003) An Analysis of Web Information Seeking and Use: Documents Retrieved Versus Documents Viewed*, Proceedings of the *4th International Conference on Internet Computing, p. 65-69. Las Vegas, Nevada, 23-26 June.*

Jansen, B. J. (2003) *Operators Not Needed? The Impact of Query Structure on Web Searching Results*, Information Resource Management Association International Conference, p. 814-817. Philadelphia, PA, 18-21 May.

Duran, S., Eastman, C., and **Jansen, B. J.** (2003) *Nutritional Information on the Web: An Analysis of Information Sought and Information Provided*, Information Resource Management Association International Conference, p. 106-108. Philadelphia, PA. 18-21 May.

Refereed Conference Proceedings

Jansen, B. J. *and Spink, A. (2003) Retrieving and Viewing Web Documents, The 2003 National Online Meeting, p. 55-57. New York, New York, 6-8 May 2003.*

Jansen, B. J. and Eastman, C. (2003) *The Effects of Search Engines and Query Operators on Top Ranked Results*, The IEEE 4th International Conference on Information Technology, Coding and Computing, p. 135-139. Las Vegas, Nevada, 28-30 April.

Jansen, B. J. and Kroner, G. (2003) *The Impact of Automated Assistance on the Information Retrieval Process*, The ACM SIGCHI 2003 Conference on Human Factors in Computing Systems, p. 1004-1006. Fort Lauderdale, Florida, 5-10 April.

Paper Award

Jansen, B. J. (2002) *Towards Implementing a Cognitive Model of Searching*, Proceedings of the E-Learning 2002 Conference (Web Track), p. 493-521. Montreal, Canada, 15-19 October.

Jansen, B. J. (2002) *A Preliminary Mapping of Web Queries Using Existing Image Query Schemes*, Proceedings of the E-Learning 2002 Conference (Web Track), p. 485-492. Montreal, Canada, 15-19 October.

Jansen, B. J., Spink, A., and Pfaff, A. (2000) *Linguistic Aspects of Web Queries*, Proceedings of the Annual Meeting of the American Society of Information Science, p. 169-176. Chicago, IL. 13-16 November.

Jansen, B. J., Spink, A., Goodrum, A., and Pfaff, A. (2000) *Web Query Structure: Implications for IR System Design*, Proceedings of the 4th World Multiconference on Systems, Cybernetics and Informatics, p. 50-55. Orlando, FL. 23-26 July.

Jansen, B. J. (1999) *A Software Agent for Performance Improvement of Existing Information Retrieval Systems*, Proceedings of the 1999 International ACM Conference on Intelligent User Interfaces, p. 122-123. Los Angeles, CA. 5-8 January.

Smith, T. L., Ruocco, A., and **Jansen, B. J.** (1999*) Digital Video in Education*, Proceedings of the ACM Computer Science Education Conference, p. 122-126. New Orleans, LA. 21-25 February.

Jansen, B. J., Spink, A., and Saracevic, T. (1999) *The Use of Relevance Feedback on the Web: Implications for Web IR System Design*, 1999 World Conference on the WWW and Internet, Honolulu, Hawaii. 24-30 October.

Jansen, B. J. and Pooch, U. (1999) *A Software Agent for Performance Improvement of an Existing Information Retrieval Engine*, 5th International Conference on Information Systems Analysis and Synthesis, p. 58-60. Orlando, Florida. 31 July-4 August.

Adams, W. J., **Jansen, B. J.**, and Smith, T. L. (1999) *Planning, Building, and Using a Distributed Digital Library*, Third International Conference on Concepts in Library and Information Science, p. 10-18. Dubrovnik, Croatia. 23-26 May.

Refereed Conference Proceedings

Smith, T. L., Wolfe, D., and **Jansen, B. J.** (1999) *Digital Video in a Twenty-First Century Classroom*, Proceedings of the Information Resources Management Association Conference, Hershey, PA. 16-19 May.

Adams, W. J. and **Jansen, B. J.** (1998) *Distributed Digital Library architecture: The Key to Success for Distance Learning*, Proceedings of the IEEE Conference on Research Issues in Data Engineering, p. 2-8. Orlando, Florida. 23-24 February.

Spink, A., Chang, C., Goz, A., and **Jansen, B. J.** (1998) *User' Interactions with the Excite Web Search Engine: A Query Reformulation and Relevance Feedback Analysis*, Proceedings of the Canadian Association of Information Science Conference, p. 342-354. Vancouver, Canada. 5 –10 June.

Jansen, B. J., Spink, A., and Saracevic, T. (1998) *Searchers, the Subjects They Search, and Sufficiency: A Study of a Large Sample of Excite Searches*, Proceedings of the 1998 World Conference on the WWW and Internet, Orlando, Florida.

Spink, A., Bateman, J., and **Jansen, B. J.** (1998) *Users' Searching Behavior on the Excite Web Search Engine*, 1998 World Conference on the WWW and Internet, Orlando, Florida, November.

Howard, R. and **Jansen, B. J.** (1998) *A proxy server experiment: an indication of the changing nature of the Web*, Proceedings of the Seventh International Conference on Computer Communications and Networks, p. 646-649. Lafayette, Louisiana. 12-15 November.

Adams, W. J., **Jansen, B. J.**, and Zoller, R. (1998) *Usability Measurements in an Undergraduate Programming Course*, Software Engineering Conference, Las Vegas, Nevada.

Jansen, B. J., Spink, A., and Saracevic, T. (1998) *Failure analysis in Query Construction: Data and Analysis from a Large Sample of Web Queries*, Proceedings of the 3rd ACM Conference on Digital Libraries, p. 289-290. Pittsburgh, PA. 23-26 July.

Spink, A., Bateman, J., and **Jansen, B. J.** (1998) *User's Searching Behavior on the EXCITE Web Search Engine*, Proceedings of the 19th National Online Meeting, p. 375-386. New York, NY. 12-14 May 1997.

Adams, W. J., Howard, R., and **Jansen, B. J.** (1998) *Distributed Digital Libraries: The Key to Success for Distance Learning*, Computers and Technology in Education, 1 -5 May. Cancun, Mexico.

Jansen, B. J. (1997) *An Information Retrieval Application for Simulated Annealing*, Proceedings of the 2nd ACM Conference on Digital Libraries, p. 259-260. Philadelphia, PA. 25-28 July.

Paper Award

Jansen, B. J. (1997) *Simulated Annealing for Query Results Ranking*, Computer Science Education Conference, San Jose, CA. 28 – 30 February.

Refereed Conference Proceedings

Spink, A., Burkett, L., Spaid, N., Bateman, J., and **Jansen, B. J.** (1997) *Why Users Search the World Wide Web (WWW): The EXCITE Study*, First Internet Librarian Conference, Monterey, CA. 16-18 November.

Adams, W. J. and **Jansen, B. J.** (1997) *Information Technology and the Classroom of the Future*, Proceedings of the Society for Information Technology in Education Conference, Orlando, Florida. 7 May.

Hamilton, J. A. and **Jansen, B. J.** (1997) *Tactical Network Simulation in the US Army*, Simulation Multi-Conference, Atlanta, Georgia. January.

Jansen, B. J. and Hamilton, J. A. (1997) *Modeling and Simulating an Army Information Support Structure*, Simulation Multi-Conference, Atlanta, Georgia. January.

Papers Presented at Technical and Professional Meetings

An, J., Cho, H.Y., Kwak, H., and **Jansen, B. J.** (2016) *Towards Automatic Persona Generation Using Social Media*. The Third International Symposium on Social Networks Analysis, Management and Security (SNAMS 2016), The 4th International Conference on Future Internet of Things and Cloud. 22-24 August.

Mukherjee, P. and **Jansen, B. J**. (2016) *The Changing Nature of Viewership: Formality of Social Media Conversations*. Workshop on Following user pathways: Using cross platform and mixed methods analysis in social media studies. ACM Conference on Human Factors in Computing Systems (CHI2016), San Jose, CA, USA, 7-12 May.

Kwon, S., Abbar, S. and **Jansen, B. J.** (2016) *Identifying Virality Attributes of Arabic Language News Articles*. Qatar Foundation Annual Research Conference 2016 (ARC'16), Doha, Qatar. 22 March.

An, J., Kwan, H., Cho, H., Hassen, M.Z., and **Jansen, B. J.** (2016) *Efforts Towards Automatically Generating Personas in Real-time Using Actual User Data*. Qatar Foundation Annual Research Conference 2016 (ARC'16), Doha, Qatar. 22 March.

Mukherjee, P. and **Jansen, B. J**. (2015) *Correlation of Brand Mentions in Social Media and Web Searching Before and After Real Life Events: Phase Analysis of Social Media and Search Data for Super Bowl 2015 Commercials*. 1st International Workshop on Event Analytics using Social Media Data at The IEEE International Conference on Data Mining series (ICDM 2015), Atlantic City, New Jersey, USA, 14 Nov.

Mukherjee, P. and **Jansen, B. J**. (2015) *Analyzing the Social Soundtrack From Second Screens Before, During, and After Real-life Events*. The First International Workshop on Online Social Networks Technologies, 2015 IEEE Jordan Conference on Applied Electrical Engineering and Computing Technologies (AEECT), Dead Sea, Jordan. 3-5 Nov.

Papers Presented at Technical and Professional Meetings

Jansen, B. J., Wong, J. S., Jablokow, K.W., Divinsky, A., Liu, Z., and Pursel, B. (2014) *Classifying MOOC Discussion Forum Posts as Information Seeking Interactions and Levels of Cognitive Learning*. Workshop on Learning at Scale at ACM CHI Conference on Human Factors in Computing Systems, (CHI 2014), Toronto, CA. 26 April - 1 May.

Liu, Z. and **Jansen, B. J.** (2012) *Factors Influencing the Response Rate in Social Question and Answering Behavior*. Workshop on Social Media Question Asking at 16th ACM Conference on Computer Supported Cooperative Work and Social Computing (*CSCW 2013*). 23-27 February. San Antonio, Texas.

Jansen, B. J. (2012) *Gender Demographic Targeting in Sponsored Search*. INFORMS International 2012. 24-27 June. Beijing, China.

Jansen, B. J. (2012) *Using Mobile Apps to Enhance Classroom Learning*. Teaching and Learning with Technology, University Park, PA, 24 March

Rosso, M. and **Jansen, B. J.** (2010) *Smart Marketing or Bait & Switch? Competitors' Brands as Keywords in Online Advertising*. 4th Workshop on Information Credibility on the Web (WICOW 2010). World Wide Web Conference (WWW 2010), Raleigh, NC. 26-30 April.

Jansen, B. J. (2009) *System Controlled Assistance for Improving Search Performance*. Human-Computer Interaction and Information Retrieval. Workshop. Washington, DC. 23 October.

Jansen, B. J., Zhang, M, Sobel, K, and Chowdury, A, (2009) *The Commercial Impact of Social Mediating Technologies: Micro-blogging as Online Word-of-Mouth Branding*. ACM Conference on Computer Human Interaction (CHI2009). Boston, Massachusetts. 4 - 9 April.

Neale, L., Hunter, L., **Jansen, B. J.**, Murphy, J. (2008) *The Google Online Marketing Challenge: A Global Teaching and Learning Initiative*. 2008 Society for Marketing Advances Annual Conference. 4-9 November. St Petersburg, Florida.

Jansen, B. J., Rosso, M., Russell, D., and Detlor, B. (2008) *The Google Online Marketing Challenge: A Multi-Disciplinary Global Teaching and Learning Initiative Using Sponsored Search*. 2008 Annual Meeting of the American Society for Information Science and Technology. 24-29 October Columbus, Ohio.

Jansen, B. J. (2008). *Viewing Searching Systems as Learning Systems*. Second Workshop on Human-Computer Interaction and Information Retrieval. 23 October. Redmond, Washington.

Murphy, J., Canhoto, A., Hofacker, C., Hunter, L., **Jansen, B. J.**, and Voorhees, C. (2008) *The Google Online Marketing Challenge: A Global Teaching and Learning Initiative*. 2008 American Marketing Association Summer Marketing Educators' Conference. 8-11 August. San Diego, California.

Papers Presented at Technical and Professional Meetings

Reddy, M. and **Jansen, B. J.** (2008) *Learning about Potential Users of Collaborative Information Retrieval Systems*. Workshop on Collaborative Information Retrieval, Joint Conference on Digital Libraries (JCDL 2008). 19 June. Pittsburgh, Pennsylvania.

Jansen, B. J., Bhavnani, S., Murray, G. C., Spink, A. and Wolfram, D. (2007) *Web Log Analysis Panel,* 2007 Annual Meeting of the American Society for Information Science and Technology. Milwaukee, Wisconsin. 18-25 October.

Spink, A. and **Jansen, B. J.** (2007) *Web Research - Results from Large-Scale Web Data Analysis,* ARC Research Network Enterprise Information Infrastructure Workshop on Data From the Field. Sydney, Australia. 24th May.

Jansen, B. J. and Spink, A. (2007) *The Effect on Click-through of Combining Sponsored and Non-Sponsored Search Engine Results in a Single Listing,* 16th International World Wide Web Conference (WWW2007) Workshop on Sponsored Search Auctions. Banff, Canada. 8-12 May.
Paper: http://opim.wharton.upenn.edu/ssa3/pdf/submission_96.pdf

Jansen, B. J. (2007) *Preserving the Collective Expressions of the Human Consciences,* 16th International World Wide Web Conference (WWW2007) Workshop on Query Log Analysis: Social and Technical Challenges. Banff, Canada. 8-12 May.
Paper: http://www2007.org/workshops/paper_58.pdf
Slides: http://querylogs2007.webir.org/slides/JimJansenQL2007.pdf

Jansen, B. J., Smith, B., and Booth, D. (2007) *Learning as a Paradigm for Understanding Exploratory Search,* Conference on Human Factors in Computing Systems (SIGCHI), Workshop on Exploratory Search Interfaces. San Jose, California. 28 April - 3 May.

Spink, A., Alvarado-Albertorio, F., and **Jansen, B. J.** (2007) *Web Search Behavior: What is Normative?,* Society of Australasian Social Psychologists (SASP) Conference. Brisbane, Australia. 12 – 15 April.

Jansen, B. J. and Spink, A. (2006) *Characteristics of searching on Web meta-search engines*, American Society for Information Science and Technology: Human Computer Interaction Workshop. Austin, TX. 3-9 November.

Jansen, B. J. (2006) *Implications of Trust of Sponsored Links for E-commerce Web Searching,* 6th Annual SIG-USE Research Symposium. American Society for Information Science and Technology (ASIS&T) Annual Conference. Austin, TX. 4 November.

Spink, A. and **Jansen, B. J.** (2006) *Web Searching: Trends and Impacts,* Oxford Internet Institute International Symposium. Journal of Information, Communication, Society: 10th Anniversary International Symposium. University of York, UK. 20 – 22 September.
http://www.york.ac.uk/res/siru/icsspinketal.htm

Papers Presented at Technical and Professional Meetings

Jansen, B. J., Spink, A., Kathura, V., and Koshman, S. (2006) *How to Define Searching Sessions on Web Search Engines,* Workshop on Web Mining and Web Usage Analysis. The 12th ACM SIGKDD International Conference on Knowledge Discovery and Data Mining (KDD 2006). Philadelphia, Pennsylvania. 20-23 August.

Jansen, B. J. (2006) *Adversarial Information Retrieval Aspects of Sponsored Search,* Second International Workshop on Adversarial Information Retrieval on the Web (AIRWeb 2006). The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). Seattle, Washington. 6-11 August.

Jansen, B. J., Ramadoss, R. Zhang, M., and Zang, N. (2006) *Wrapper: An Application for Evaluating Exploratory Searching Outside of the Lab,* SIGIR 2006 Workshop on Evaluating Exploratory Search Systems. The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). Seattle, Washington. 6-11 August.

Buzikashvili, N. and **Jansen, B. J.** (2006) *Limits of the Web Log Analysis Artifacts,* Workshop on Logging Traces of Web Activity: The Mechanics of Data Collection, The Fifteenth International World Wide Web Conference (WWW 2006). Edinburgh, Scotland. 22-26 May.

Jansen, B. J. (2006) *The Wrapper: An Open Source Application for Logging User – System Interactions during Searching Studies,* Workshop on Logging Traces of Web Activity: The Mechanics of Data Collection. The Fifteenth International World Wide Web Conference (WWW 2006). Edinburgh, Scotland. 22-26 May.

Jansen, B. J., Rieh, S.Y., Spink, A., Wang, P., and Wolfram, D. (2005) *Panel Presentation: Internet Usage Transaction Log Studies: The Next Generation,* American Society for Information Science & Technology 2005 Annual Meeting. Charlotte, North Carolina. 28 October – 2 November.

Toms, E.L., **Jansen, B. J.**, and Muresan, G. (2005) *Panel Presentation: Evaluating Success in Search Systems,* American Society for Information Science & Technology 2005 Annual Meeting. Charlotte, North Carolina. 28 October – 2 November.

Jansen, B. J. (2005) *A Multi-Disciplinary, Multi-Level, and Multi-Spectrum View of Interaction,* The First Conference of the i-School Community: Bridging Disciplines to Confront Grand Challenges. 28-30 September 2005, State College, PA.

Jansen, B. J. and Resnick, M. (2005) *Examining Searcher Perceptions of and Interactions with Sponsored Results,* Workshop on Sponsored Search Auctions, The Sixth ACM Conference on Electronic Commerce (EC'05). Vancouver, Canada. 5-8 June.

Jansen, B. J. (2005) *Automated Searching Assistance for Exploratory Search,* Seminar on Exploratory Search Interfaces at the University of Maryland sponsored by the Human-Computer Interaction (HCI) Lab. College Park, Maryland. 2 June.

Papers Presented at Technical and Professional Meetings

Shingle, A. **Jansen, B. J.**, and Spink, A. (2005) *Television Advertising of Prescription Drugs: A Study of Its Effect on Consumer Web Searching,* IEEE 6th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada, 11-13 April, 2005.

Jansen, B. J.*, Spink, A.,* and Pederson, J. *(2004) An Analysis of Multimedia Searching on AltaVista*, Presentation at Workshop on User Searching, World Wide Web Conference, New York, New York, 18 May 2004.

De Ycaza, S., Doran, S., Eastman, C., and **Jansen, B. J.** *(2003) Nutritional Information on the Web: An Analysis of Information Sought and Information Provided, South Carolina Nutrition Research Summit, Columbia, SC. 17 October 2004.*

Jansen, B. J. (1998) *An Analysis of User Queries on the Web: The Implications for the Design of Military Information Retrieval Systems*, Fifth Annual US Army Research Laboratory and United States Military Academy Technical Symposium, West Point, New York.

Jansen, B. J. (1997) *Simulated Annealing in Information Retrieval*, Fifth Annual US Army Research Laboratory and United States Military Academy Technical Symposium, West Point, New York.

Adams, W. J. and **Jansen, B. J.** (1997) *Integrating Usability Design Principles into an Existing Engineering Curriculum*, The American Society for Engineering Education National Conference, Milwaukee, Wisconsin.

Jansen, B. J. and Adams, W. L. (1997) *Integrating User Centered Design into an Introductory Engineering Course*, American Society for Engineering Education Zone 1 Meeting, West Point, New York.

Scholarly Reports

Jansen, B. J. (2011) *The civic and community engagement of religiously active Americans*. Pew Internet & American Life Project, Pew Research Center. 13 December. http://pewinternet.org/Reports/2011/Social-side-of-religious.aspx

Jansen, B. J. (2010) *65% of Internet Users Have Paid for Online Content*. Pew Internet & American Life Project, Pew Research Center. 30 December. http://www.pewinternet.org/Reports/2010/Paying-for-Content.aspx

Jansen, B. J. (2010) *Use of the internet by higher income households*. Pew Internet & American Life Project, Pew Research Center. 24 November. http://www.pewinternet.org/Reports/2010/Better-off-households.aspx

Jansen, B. J. (2010) *Online Product Research*. Pew Internet & American Life Project, Pew Research Center. 29 September. http://pewinternet.org/Reports/2010/Online-Product-Research.aspx

Funded Projects, Grants, Commissions, and Contracts	
2015 - 2014	Title: Web Analytics for a Research University Library Granting Agency: **Penn State, University Library** Total Amount: $19,717 Role: Principal Investigator
2015 - 2013	Title: Exploring Scholarly Discourse in MOOC Discussion Forums Granting Agency: **Penn State, Center for Online Innovation in Learning** Total Amount: $30,383 Role: Principal Investigator
2014 - 2010	Title: Broadband to Support SMEs in Pennsylvania Granting Agency: **Commonwealth of Pennsylvania** Total Amount: $500,000 Role: Faculty Investigator ($70,000)
2014 - 2010	Title: Semantic CiteSeerX Granting Agency: **National Science Foundation** Total Amount: $1,100,000 Role: Principal Investigator ($130,000)
2011 - 2008	Title: Affective and Cognitive Factors Affecting the Evaluation of Search Engines by Users Granting Agency: **Google** Amount: $50,000 Role: Principal Investigator
2011 - 2009	Title: Using Keyword Advertising for Economic and Workforce Development Granting Agency: The **Pennsylvania State University** Amount: $25,000 Role: Principal Investigator
2011 - 2010	Title: Toolkits for Deployable Best Practices Granting Agency: **Office of Naval Research** STTR Phase II Total Amount: $750,000 Role: Principal Investigator ($87,500)
2011 - 2010	Title: RAPID: Text Message-based Infrastructure for Emergency Response Granting Agency: **National Science Foundation** Total Amount: $75,000 Role: Principal Investigator ($15,000)

Funded Projects, Grants, Commissions, and Contracts	
2009 - 2008	Title: Toolkits for Deployable Best Practices Granting Agency: **Office of Naval Research** STTR Phase I Total Amount: $100.000 Role: Principal Investigator ($15,000)
2009 - 2007	Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: **National Science Foundation** Amount: $12,000 Role: Co-Principal Investigator ($12,000).
2009 - 2006	Title: Synchronized Interactions Among Users, Systems, and Information Granting Agency: **Air Force Research Lab** Amount: $463,000 Role: Principal Investigator ($463,000).
2008 - 2005	Title: The Next Generation CiteSeer Granting Agency: **National Science Foundation** Amount: approximately $1,444,984 Role: Co-principal Investigator with Dr. Lee Giles, Dr. Susan Gauch, and Dr. Jack Carroll ($48,701)
2009 - 2007	Title: Triggers in Collaborative Information Searching Granting Agency: **National Science Foundation** Amount: $76,000 Role: Co-principal Investigator with Dr. Madhu Reddy ($18,119)
2009 - 2008	Title: REU Supplement for Triggers in Collaborative Information Searching Granting Agency: **National Science Foundation** Amount: $12,000 Role: Co-principal Investigator with Dr. Madhu Reddy ($6,000)
2007 - 2006	Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: **National Science Foundation** Amount: $9,000 Role: Co-Principal Investigator ($9,000).
2005 - 2004	Title: Design of Tools for Information Seeking, Management, and Analysis for a Lessons Learned Knowledge System Granting Agency: **US Marine Corps Research University** Amount: $500,000 Role: Co-Principal Investigator ($83,957)

Funded Projects, Grants, Commissions, and Contracts	
2005	Title: Knowledge Management Granting Agency: **US. Department of Defense, Defense Threat Reduction Agency (DTRA)** Amount: $625,832 Role: Co-Principal Investigator ($18,439).
2006 - 2005	Title: REU Supplement for CRI: Collaborative: Next Generation CiteSeer Granting Agency: **National Science Foundation** Amount: $6,000 Role: Co-Principal Investigator ($6,000).
1998 -1996	Title: The use of software agents in information retrieval. Granting Agency: **Army Research Laboratory** Amount: $68,000 Role: Principal Investigator ($68,000)
1998	Title: Information Searching on Web Search Engines Granting Agency: **Army Research Laboratory** Amount: $5,000 Role: Principal Investigator ($5,000)
1997	Title: Software agents for information retrieval. Granting Agency: **Army Research Laboratory** Amount: $5,000 Role: Principal Investigator ($5,000)

Software Developed

Software Development: Client-side Application for Automated Searching: that automates searching tactics via user implicit feedback.

Software Development: Application for Real-time Evaluation of Search Engine Performance: that automates the evaluation of Web search engines.

Teaching

At *The Pennsylvania State University* (current – 2002), I have taught a variety of information technology-related courses, including the undergraduate capstone project leadership course, the introductory freshman course, online marketing, graduate seminar course, and a graduate course on human information interaction. Additionally, I have mentored students in a variety of independent studies and have been on several course development committees.

At The Pennsylvania State University (current – 2002):

Teaching

- Committee Lead, curriculum development team for a college-level executive masters program.
- Committee Lead, curriculum development committee for re-design of the undergraduate senior – level capstone course.
- Committee Member, curriculum development team for re-design of the undergraduate freshmen level introductory course.
- Committee Member, curriculum development team for the establishment of a university-wide Business Analytics minor
- Faculty Lead, development team for the establishment of a university-wide professional library certification program
- Committee Member, curriculum development team for the establishment of a college Entrepreneurship minor
- Course Development: (1) undergraduate capstone course in IT project management, (2) graduate course in information searching, (3) undergraduate course in keyword advertising, (4) graduate course in web analytics, (5) undergraduate course in entrepreneurship technology

2015 – Mentor for one team in the **Google Final 15 in The Google Online Marketing Challenge** for 2014. The team was in the top fifteen from 4,000 teams from around the world (top 0.4%).

Mentor for team in the **Google Non-profit Challenge** for 2014. The teams were the top more than 4,000 teams from around the world (top 0.4%).

2014 – Mentor for three teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2013. The teams were in the top fifteen from 4,000 teams from around the world (top 0.4%).

Mentor for two teams in the **Google Media Marketing Challenge** for 2013. The teams were the top more than 4,000 teams from around the world (top 0.4%).

2013 – Mentor for one team in the **Global Final 15 in The Google Online Marketing Challenge** for 2012. The team was in the top fifteen from more than 4,000 teams from around the world (top 0.4%).

2012 – Mentor for three teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2011. The three teams were in the top fifteen from 4,000 teams from around the world (top 0.4%).

2010 – Mentor for two teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2009. The two teams were in the top fifteen from 3,000+ teams from around the world (top 0.5%).

Had eight other teams get honorable mention by placing in the Top 100 Global Teams and five other teams place in the Top 10% of all teams.

Teaching

2010 – Mentor for two student teams that took 1st and 3rd in the **Penn State IdeaPitch Competition**, which is a university wide Penn State entrepreneurship competition.

2009 – Mentor for three teams in the **Global Final 15 in The Google Online Marketing Challenge** for 2009. The three teams were in the top fifteen from 2,107 teams from around the world.

Had seven other teams get honorable mention by placing in the top 50 teams in the Americas region.

2009 - **Schreyer Honors College Teaching Grant** Recipient for developing multi-disciplinary keyword advertising, marketing, and technology course.

2008 – Mentor for the **winning team in the Americas region in The Google Online Marketing Challenge for 2008**. One of the top four teams from 1,620 teams from around the world. Won a trip to the GooglePlex with the students, plus the students all won laptops.

Had two other teams get honorable mention by placing in the top 50 teams in the Americas region.

2008 – Selected as **Faculty Marshall** by Student Marshall of Computer Science and Engineering Department, College of Engineering, The Pennsylvania State University as faculty member who had the biggest impact on student's academic career

2008 – **Professor of the Year nominee** for College of Information Sciences and Technology, The Pennsylvania State University, 16802

2003 Selected as **Faculty Marshall** by Student Marshall of School of Information Sciences and Technology, The Pennsylvania State University as faculty member who had the biggest impact on student's academic career

Guest lecturer for a month (2000) at the *Korean Military Academy* in Seoul, Republic of Korea.

At the *University of Maryland* (Asian Division) (2000 – 1999), taught courses on Web/Internet and multimedia design.

At the *United States Military Academy* (1999 – 1996), I taught several computer science-related courses including introductory programming, advanced programming, micro-computing, and databases. Also, mentored students in a variety of independent studies.

As executive officer for the department (1999 – mid 1997), was responsible for course scheduling, instructor assignments, classroom allocation, student counseling, as well as many other duties concerning the day-to-day operation of the department.

Membership on Degree Committees

The Pennsylvania State University
College of Information Sciences and Technology

Chair or Co-Chair

Partha Mukherjee (Committee Chair) (PhD degree expected in 2016)
Alex Brown (Committee Chair) (M.S. degree expected in 2016)
Zhe Liu (Committee Chair) (PhD degree conferred in 2014)
Dan Coughlin (Committee Chair) (PhD degree conferred in 2014)
Carolyn Hafernik (Committee Chair) (M.S. degree conferred in 2013)
Adan Ortiz-Cordova (Committee Chair) (M.S. degree conferred in 2013)
Jian-Syuan Wong (Committee Chair [until 2016]) (PhD degree expected in 2018)
Steve Carmen (Committee Chair [until 2013]) (M.S. degree conferred in 2013)
Kathleen Moore (Committee Chair [until 2012]) (PhD degree expected in 2015)
Mimi Zhang (Committee Chair) (PhD degree conferred in 2010)
Mike Hills (Committee Chair) (PhD degree conferred in 2010)
Hyun-Woo Kim (Committee Co-Chair) (M.S. degree conferred in 2010)
Young Shin Kim (Committee Co-Chair) (M.S. degree conferred in 2010)

Committee Member

Eric McMillan (Committee Member) (PhD degree expected in 2017)
Nathan McNeese (Committee Member) (PhD degree conferred in 2014)
Patricia Spence (Committee Member) (PhD degree conferred in 2013)
Arvind Karunakaran (Committee Member) (M.S. degree conferred in 2011)
Yusuf Raza (Committee Member) (M.S. degree conferred in 2009)
Sharoda Paul (Committee Member) (PhD degree conferred in 2009)
Allison Morgan (Committee Member) (PhD degree conferred in 2008)
Mithu Bhattacharya (Candidacy Committee Member, 2005)
Scott Robertson (Candidacy Committee Chair, 2004)

The Pennsylvania State University
Workforce Education and Development Program, College of Education
John Dolan (Committee Co-Chair [until 2012]) (PhD degree expected in 2013)

The Pennsylvania State University
School of Hospitality and Management
Lu Zhang (Committee Co-Chair) (M.S. degree conferred in 2009)

The Pennsylvania State University
Department of Industrial and Manufacturing Engineering
Himanshu Sharma (Committee Chair) (M.S. degree conferred in 2005)
Sourav Sengupta (Committee Chair) (M.S. degree conferred in 2005)
Ying Zhang (Committee Chair) (M.S. degree conferred in 2008)

The Pennsylvania State University
Department of Electrical Engineering
Vijay Mohan (Committee Co-Chair) (M.S. degree conferred in 2009)
Dheepak Ramaswamy (Committee Co-Chair) (M.S. degree conferred in 2009)
Ashish Kathuria (Committee Chair) (M.S. degree conferred in 2007)

Membership on Degree Committees

The Pennsylvania State University
Department of Computer Science and Engineering
Yanjun Gao (Committee co-Chair) (PhD degree expected in 2018)
Chandrika Gopalakrishna (Committee Chair) (M.S. degree conferred in 2008)

The University of Pittsburgh
School of Information Sciences
Department of Library and Information Science
Zhen Yue (Committee Member) (Ph.D. degree conferred in 2014)
Minsoo Park (Committee Member) (Ph.D. degree conferred in 2008)

Rutgers, the State University of New Jersey
School of Communication, Information and Library Studies
Yuelin Lee (Committee Member) (Ph.D. degree conferred in 2008)

The Pennsylvania State University
Schreyer Honors College, thesis advising
Megan Krause (B.S. degree expected 2107)
Allie Whitman (B.S. degree expected 2106)
Adan Ortiz-Cordova (B.S. degree conferred 2011)
Bradley Shively (B.S. degree conferred 2010)
Kate Sobel (B.S. degree conferred 2010)
Steven Troxell (B.S. degree conferred in 2008)
Steven Clancy (B.S. degree conferred in 2007)
Paulo Molina (B.S. degree conferred in 2004)
Chris Catalano (B.S. degree conferred in 2004)
Andy Shingle (B.S. degree conferred in 2004)

Supervision of Other Undergraduate Research

Student	Degree	Major	University	Role
Arielle Amchin	BS	Marketing	Penn State	Research Mentor
Arun Das	BS	CS	Brown University	Research Mentor
Manisha Dareddy	BS	MIS	Carnegie Mellon Qatar	Research Mentor
Satyajit Narayanan	BS	CS	Bharati Vidyapeeth University	Research Mentor
Will Berkheiser	BS	IST	Penn State	Work Study Mentor http://studentaid.psu.edu/types-of-aid/work-study-and-employment/work-study/about
Pat Bonner	BS	IST	Penn State	Research Mentor
Danielle Booth	BS	IST	Penn State	Research Mentor
Anna Brown	BS	IST	Penn State	Research Mentor
Nicole Butera	BS	Chemistry	Penn State	Women in Science and Engineering Research

Supervision of Other Undergraduate Research

Student	Degree	Major	University	Role
				(WISER) Mentor http://pa.spacegrant.org/wiser
Chris Ciamacca	BS	IST	Penn State	Research Mentor
Karen Lee	BS	IST	Penn State	Research Mentor
Dana Kracow	BS	IST	Penn State	Research Mentor
Daehee Park	BS	IST	Penn State	Research Mentor
Melissa Reizner	BS	IST	Penn State	Research Mentor
Mitchell Rukat	BS	IST	Penn State	Research Mentor
Paul Rinaldi	BS	IST	Penn State	Research Mentor
Simone Schuster	BS	Advertising	Penn State	Research Mentor
Laura Solomon	BS	Advertising	Penn State	Research Mentor
Meng Ting Sun	BS	Accounting	Penn State	Research Mentor
Pete Smith	BS	IST	Penn State	Research Mentor
Megan Tan	BS	Marketing	Penn State	Research Mentor
Courtney Weaver	BS	IST	Penn State	Research Mentor

Professional Service

Editorial Boards

Current – 2016 Editor-in-chief, Information Processing & Management (Elsevier)

Current – 2016 Editorial Board Member, Information Discovery and Delivery

Current – 2012 Editorial Advisory Board Member, Social Networks

Current – 2011 Editorial Advisory Board Member, International Journal of Electronic Business

Current – 2009 Editorial Advisory Board Member, Journal of the American Society for Information Science and Technology

Current – 2009 Editorial Advisory Board Member, Future Internet

Current – 2006 Editorial Panel, International Journal of Internet Science

Current – 2006 Editorial Advisory Board Member, Information Research

Current – 2004 Editorial Advisory Board Member, Information Processing & Management

2016 – 2011 Editor-in-chief, Internet Research (Emerald)

2011 - 2004 Editorial Advisory Board Member, Journal of Internet Research

Professional Service

Editorial Boards

2010 - 2004 Editorial Advisory Board Member, Library and Information Science Journal

2008 - 2004 Associate Editor (Book Reviews), Information Processing & Management

1996 –1998 Student Editor, SIG Computer Human Interaction SIGCHI Bulletin

Professional Service

Tenure Letters

2016 External Tenure Letter Writer for faculty member of School of Business, McMaster University

2016 External Tenure Letter Writer for faculty member of Department of Library and Information Science, The Catholic University of America

2015 External Tenure Letter Writer for faculty member of School of Communication and Information, Rutgers University

2013 External Tenure Letter Writer for faculty member of College of Information Science and Technology, Drexel University

2013 External Tenure Letter Writer for faculty member of Graduate School of Management, University of Haifa

2012 External Tenure Letter Writer for faculty member of Faculty of Social Sciences, Bar-Ilan University

2012 External Tenure Letter Writer for faculty member of Henry B. Tippie College of Business, The University of Iowa

2012 External Tenure Letter Writer for faculty member of School of Business, North Carolina Central University

2010 External Tenure Letter Writer for faculty member of School of Business Administration, Bar Ilan University, Israel

2009 External Tenure Letter Writer for faculty member of Computer Information Systems Department, Bentley University

Professional Service

Ad hoc Reviewing

2016 Reviewer, IEEE Systems, Man and Cybernetics, Computers in Human Behavior, International Journal of Human Computer Interaction, Cornell Hospitality Review

2015 Reviewer, Transactions on Intelligent Systems and Technology, Journal of Organizational Computing and Electronic Commerce, European Journal of Marketing, Journal of Information Management, Transactions on Management Information Systems

2014 Reviewer, MIS Quarterly, Journal of Organizational Computing and Electronic Commerce, Computers in Human Behavior, Journal of Documentation, IEEE Systems, Man and Cybernetics, Tourism Management

2013 Reviewer, Technological Forecasting & Social Change, IEEE Systems, Man and Cybernetics, International Journal of Electronic Commerce, ACM Transactions on the Web, Journal of Interactive Marketing, Journal of Electronic Commerce Research (2x), Electronic Commerce Research, Communications of the Association for Information Systems, Transactions on Computer-Human Interaction, Information Research, Information and Management

2012 Reviewer, Electronic Commerce Research, International Journal of Information Management, Journal of Information Science, Communication Research, International Journal of Internet Science, Journal of Organizational Computing and Electronic Commerce, Social Science Computer Review, Information Research, MIS Quarterly, Journal of Organizational Computing and Electronic Commerce, Library and Information Science, IEEE Transactions on Multimedia, Advances in Human-Computer Interaction (2x), Journal of Theoretical and Applied Electronic Commerce Research (3x), ACM Transactions on Computer-Human Interaction

2011 Reviewer, IEEE Transactions on Multimedia, Information Technology and People, Journal of Computer-Mediated Communication (2x), Sage Publishing, Electronic Commerce Research, International Journal of Electronic Commerce, Journal of Interactive Marketing (2x), ACM Transactions on the Web, ACM Transactions on Computer-Human Interaction

2010 Reviewer, International Journal of Information Management (2x), ACM Transactions on the Web, Social Science Computing Review, MIS Quarterly, International Journal of Human-Computer Studies, PLoS One, Information Research, Netherlands Organisation for Scientific Research, Computing Surveys, Information Sciences, Future Internet, International Information and Library Review, International Journal of Internet Science, Behaviour & Information Technology, Journal of Media Economics

Reviewer Award

2010 Reviewer, Internet Research

2009 Reviewer, The Computer Journal, ACM Transactions on the Web, International Journal of Electronic Commerce, Data & Knowledge Engineering Journal, ACM Transactions on Information Systems

Professional Service

Ad hoc Reviewing

2008 Reviewer, Journal of the Academy of Marketing Science, ACM Transactions on the Web, ACM Transactions on Information Systems, Decision Support Systems, New Media & Society, IEEE Internet Computing, Journal of Service Science and Management, IEEE Transactions on Professional Communication, International Journal of Knowledge Management Studies

2007 Reviewer, Simulation Modelling Practice and Theory, ACM Transactions on Information Systems

2006 Reviewer, Journal of Information Science, ACM Transactions on Information Systems

2005 Reviewer, Journal of Medical Internet Research, ACM Transactions on Information Systems

2005 Reviewer, IEEE Systems, Man and Cybernetics Journal, Computer Networks Journal

2004 Reviewer, Information Retrieval, Information Processing & Management, Journal of Web Engineering, Journal of Library & Information Science Research

2003 Reviewer, IEEE Proceedings-Software, Information Processing & Management

2002 Reviewer, Journal of Informing Science, Information Processing & Management, The World Wide Web Journal

2001 Reviewer, International Journal of Human Computer Studies, Information Processing & Management

1999 Reviewer, Information Processing & Management

1998 Reviewer, Computer Science Education Journal, Information Processing & Management

Professional Service

Grant Reviewing

2015 Reviewer, Qatar Research Program, Qatar Foundation

2014 Reviewer, grant panelist for National Science Foundation, CISE Research Infrastructure (CRI) program February 2014.

2013 Reviewer for grant proposal for Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards

2012 Reviewer, Army Research Lab Grant Proposal

Professional Service

Grant Reviewing

2011 Reviewer, National Science Foundation Grant Proposal

2011 Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards

2010 Reviewer, Standard Research Grants program of the Social Sciences and Humanities Research Council of Canada (SSHRC) Grant Proposal

2010 Reviewer for grant proposal for Reviewer, American Association for the Advancement of Science (AAAS) Research Competitiveness Program Grant Proposal for funding through the Maine Technology Institute's Development Awards

2008 Reviewer, Israel Science Foundation Grant Proposal

2007 Reviewer, Air Force Office of Scientific Research Grant Proposal

2007 Reviewer, Israel Science Foundation Grant Proposal

2004 Grant Reviewer, Arts and Humanities Research Board Grant Proposal, Whitefairs, Lewins Mead, Bristol, UK, BS1 2AE

Professional Service

Other

2016 Special Issue on Computational Advertising, IEEE Intelligent Systems. Guest Editors: Yanwu Yang, Huazhong University of Science and Technology, China; Yinghui Yang, University of California, Davis, US; Bernard J. Jansen, Qatar Computing Research Institute, HBKU; Mounia Lalmas, Yahoo Labs, UK.

2016 – 2007 Academic Panelist for The Google Online Marketing Challenge (http://www.google.com/onlinechallenge/). Based on registrations from more than 100 countries and more than 11,000 student teams, the Challenge may be the largest, worldwide educational course ever done.

2015 External Examiner for Spanish PhD thesis (Universitat Pompeu Fabra Barcelona)

2014 – 2013 Faculty Advisor for the Penn State Digital Marketing Association

2012 External Examiner for Australian PhD thesis (Queensland University of Technology)

2012 - 2011 Member, Research Committee, Search Engine Marketing Professional Organization (SEMPO)

Professional Service

Other

2011 – 2009 Chair of the American Society for Information Science and Technology (ASIST) Information Science Education Committee

2010 Reviewer, Cambridge University Press book proposal

2010 Reviewer, Cambridge University Press book proposal

2010 External Examiner for Australian PhD thesis (University of Sydney)

2009 – 2006 Chair of the American Society for Information Science and Technology (ASIST) Information Science Education Committee Dissertation Jury

2008 External Examiner for Australian PhD thesis (The University of New South Wales)

2008 External Examiner for Australian PhD thesis (The University of New South Wales)

2008 Guest Editor, International Journal of Electronic Business (IJEB). Special Issue on Sponsored Search

2007 External Examiner for Australian PhD thesis (Monash University)

2007 Guest Editor, with Andy Edmond, Kirstie Hawkey, Melanie Kellar, and Don Turnbull. Journal of Web Engineering. Special Issue on Logging Traces of Web Activity

2006 Guest Editor, Bulletin of the American Society for Information Science and Technology. Special Issue on Paid Search, January 2006

1995 -1994 President, Computer Science Graduate Students Association, Texas A&M University, College Station, Texas.

Professional Service

Conference Activities

2016 Chair, Program Committee, The Second International Workshop on Online Social Networks Technologies (OSNT-2016), 13th ACS/IEEE International Conference on Computer Systems and Applications AICCSA 2016. 29 November - 2 December.

2016 Chair, Program Committee, The Third International Workshop on Social Networks Analysis, Management and Security (SNAMS - 2016), The 4th International Conference on Future Internet of Things and Cloud (FiCloud-2016), Vienna, Austria. 22-24 August.

2016 Reviewer, Papers and Posters, 79th Annual Meeting of the American Society for Information Science and Technology (ASIST 2016). Copenhagen, Denmark. 14-18 October.

Professional Service

Conference Activities

2015 Program Committee, 7th International Joint Conference on Knowledge Discovery, Knowledge Engineering and Knowledge Management, Lisbon, Portugal. 12-14 Nov.

2015 Meta-Reviewer, Papers and Posters, 78th Annual Meeting of the American Society for Information Science and Technology (ASIST 2015). St. Louis, Mo. 6-10 November.

2015 Reviewer, ACM CHI Conference on Human Factors in Computing Systems, Seoul, South Korea. 18-23 April.

2014 Reviewer, Papers and Posters, 77th Annual Meeting of the American Society for Information Science and Technology (ASIST 2014). Montreal, Canada. 31 October - 4 November.

2014 Program Committee: 3rd International Information Systems for Crisis Response and Management Conference (ISCRAM 2014), State College, PA. May 2014.

2014 Reviewer, ACM CHI Conference on Human Factors in Computing Systems, Toronto, Canada. 26 April – 1 May.

2013 Reviewer, Papers, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.

2013 Reviewer, Posters, 76th Annual Meeting of the American Society for Information Science and Technology (ASIST 2013). Montreal, Canada. 1-6 November.

2013 Reviewer, 22nd International World Wide Web Conference (WWW 2013). 13th-17th, May, Rio de Janeiro, Brazil.

2013 Program Committee: European Conference on Information Retrieval (ECIR 2013) Workshop on Group Membership and Search (GRUMPS), 24 March, Moscow, Russia

2013 Program Committee: Sixth ACM WSDM Conference on Web Search and Data Mining Workshop on Web Search Click Data, 4-8 February, Rome, Italy.

2012 Program Committee: Fourth Information Interaction in Context Conference (IIIX 2012), Nijmegen, the Netherlands, 21-24 August 2012.

2011 Session Track Chair, 74th Annual Meeting of the American Society for Information Science and Technology (ASIST 2011). 9-13 October. New Orleans, LA.

2011 Program Committee, iConference. Toronto, Canada, 7-10 February.

2011 Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011), Best Paper Committee, Dublin, Ireland, 19-21 April 2011

Professional Service

Conference Activities

2011 Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011), Workshop on Information Retrieval Over Query Sessions, Dublin, Ireland, 19-21 April 2011.

2011 Program Committee: 12th ACM Conference on Electronic Commerce (EC11). San Jose, CA. 5-9 June.

2011 Program Committee: Conference on Multilingual and Multimodal Information Access Evaluation (CLEF 2011). Amsterdam, the Netherlands, 19-22 September 2011.

2011 Program Committee: 33rd European Conference on Information Retrieval (ECIR 2011). Dublin, Ireland. 18-21 April.

2010 Program Committee, American Society for Information Science and Technology Annual Meeting 2010. Pittsburgh, PA. 22-27 October.

2010 Program Committee: Conference on Multilingual and Multimodal Information Access Evaluation (CLEF 2010). Padua, Italy, 20-23 September.

2010 Program Committee: LREC 2010 Workshop on Web Logs and Question Answering (WLQA2010). Malta, 22 May.

2010 Program Committee: 32st European Conference on Information Retrieval (ECIR 2010). Keynes, UK. 28-31 March.

2009 Program Committee: Web Information and Data Management. 19th International Conference on Information and Knowledge Management (CIKM 2009). Hong Kong. 6 November.

2009 Program Committee: Workshop on the Analysis of System Logs. 22nd ACM Symposium on Operating Systems Principles. Big Sky, MT.14 October.

2009 Program Committee: Collaborative Information Behavior. GROUP 2000. Sanibel Island, Florida. 10 May.

2009 Program Committee: Qualitative and Quantitative Methods in Libraries International Conference (QQML2009). Chania, Crete, Greece, 26-29 May.

2009 Program Committee: 31st European Conference on Information Retrieval (ECIR 2009). Toulouse, France. 6-9 April.

2009 Reviewer, ACM Conference on Computer Human Interaction 2009 (CHI 2009), Boston, MA, 4 – 9 April.

2008 Reviewer, 18th Conference on Information and Knowledge Management (CIKM 2008). Napa Valley, California. 26-30 October.

Professional Service

Conference Activities

2008 Program Committee: Workshop on Human-Computer Interaction and Information Retrieval (HCIR 2008). Redmond, Washington.23 October.

2008 Program Committee: 1st Information Interaction in Context Symposium (IiiX 2008). London, United Kingdom. 14-17 October.

2008 Program Committee: 2008 Ad Auctions Workshop. ACM Conference on Electronic Commerce in Chicago, IL. 8-9 July.

2008 Reviewer, Southern Association for Information Systems Conference (SAIC 2008), Richmond, VA, USA 13–15 March.

2007 Program Committee, IEEE International Conference on Intelligence and Security Informatics 2007 (ISI 2007), New Brunswick, New Jersey. 23-24 May, 2007

2007 Reviewer, Graphics Interface 2007, Montréal, Canada, 28 – 30 May 2007.

2007 Reviewer, American Society for Information Science and Technology Annual Meeting 2007. Milwaukee, Wisconsin. 18-25 October.

2007 Program Committee, 8th World Congress on the Management of eBusiness. Toronto, Canada. 11-13 July.

2007 Program Committee, WWW'07 Workshop on Query Log Analysis: Social and Technological Challenges. World Wide Web 2007, Banff, Alberta, Canada. 8 May.

2007 Program Committee, WWW'07 Workshop on Sponsored Search. World Wide Web 2007, Banff, Alberta, Canada. 8 May.

2007 Program Committee, Chi'07 Workshop on Exploratory Search and HCI: Designing and Evaluating Interfaces to Support Exploratory Search Interaction. ACM CHI2005, Conference on Human Factors in Computing Systems (CHI'07), San Jose, CA. 29 April 2007.

2007 Program Committee, IEEE Intelligence and Security Informatics Conference (ISI 2007), New Brunswick, NJ. 23 – 24 May, 2007.

2006 Program Committee: 2006 Research Symposium of the Special Interest Group on Human-Computer Interaction. American Society for Information Science and Technology. Austin, Texas. 5 November 5, 2006

2006 Reviewer, Hawaii International Conference on System Sciences 2007. Waikoloa, Big Island, Hawaii. 3-6 January, 2007.

2006 Program Committee: IEEE Information Technology: New Generations (ITNG) 2006, Las Vegas, NV. 16 -19 April 2007.

Professional Service

Conference Activities

2006 Reviewer for SIGIR 2006 Workshop on Evaluating Exploratory Search Systems. The 29th Annual International ACM SIGIR Conference on Research & Development on Information Retrieval (SIGIR2006). 6-11 August. Seattle, Washington.

2006 Program Committee: 4th International Conference on Information Technology: New Generations, 16-19 April, 2007, Las Vegas, Nevada.

2006 Program Committee: 1st Information Interaction in Context Symposium (IiiX symposium). Copenhagen, Denmark. 18-20 October 2006.

2006 Program Committee: IEEE Information Technology: New Generations (ITNG) 2006, Las Vegas, NV. 10 – 12 April 2006.

2006 Reviewer, The Fourth Annual Pre-ICIS Workshop on HCI Research in MIS, International Conference on Information Systems, 2005.

2006 Reviewer, Human Factors and Ergonomics Society 49th Annual Meeting, 2005.

2006 Program Committee: IEEE 6th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April 2005.

2006 Program Committee: the 5 h International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.

2006- 2002 Reviewer, ACM SIGIR International Conference on Information Retrieval.

2006 Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 4-6 April 2005.

2005 Program Committee, IEEE 6th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2005.

2005 Program Committee, the 5 h International Conference on Conceptions of Library and Information Science, Glasgow, Scotland, 6-9 June 2005.

2004 Session Track Co-chair, Web Searching Sessions (Three tracks), the IEEE 5th International Conference on Information Technology, Coding and Computing. Las Vegas, Nevada. 5-7 April, 2004.

2004 Reviewer, ACM CHI2005, Conference on Human Factors in Computing Systems

1998 Session Moderator, New Engineering Educators Conference, June 1998, Seattle, Washington.

1998 Co-organizer for ACM Computer Science Education Research Competition, February 1998, Atlanta, Georgia.

Professional Service

Conference Activities

1998 Reviewer, New Engineering Educators Conference

1998 Reviewer, American Society for Engineering Education National Conference

1997 Session Moderator for American Society for Engineering Education National Conference, June 1997, Milwaukee, Wisconsin.

Advisory Boards

Current - 2012	CLAK Impressions http://www.linkedin.com/company/clak-impressions
Current - 2010	The Pennsylvania Technical Assistance Program (PennTAP), http://penntap.psu.edu/action-council/
Current - 2010	Innoblue, http://innoblue.org/
2016 - 2007	Global Academic Panel, Google Online Marketing Challenge, http://www.google.com/onlinechallenge/discover/judging-panel.html
2012 - 2010	Chief Marketing Officer (CMO Council) Advisory Board for research initiative, Localize to Optimize Sales Channel Effectiveness
2012 - 2010	Jabbit Board of Advisors, http://www.jabbit.com/

Invited Talks (Selected)

Keynote Keynote, 2016 Sixth National Doctoral Forum of Information Science, 7-18 July 2016, Tianjin, China.
http://jimjansen.blogspot.qa/2016/07/keynote-speaker-at-2016-sixth-national.html

Keynote Keynote, The 7th International IEEE on Information and Communication Systems (ICICS 2016), 5-7 April, Irbid, Jordan.

Keynote Keynote, The 10th International ACM Conference on Ubiquitous Information Management and Communication (IMCOM 2016), 4-6 January, Danang, Vietnam.
http://jimjansen.blogspot.qa/2015/12/imcom-2016-keynote-transformed-role-of.html

Presentation, Sungkyunkwan University (Sowan Campus), 23 April 2015, Seoul, South Korea. http://jimjansen.blogspot.com/2015/04/visit-to-department-of-interaction.html

Presentation, National Research University Higher School of Economics, 10 March 2014, St. Petersburg, Russia
http://jimjansen.blogspot.com/2014/03/presentation-at-national-research.html

Invited Talks (Selected)

Presentation, Yandex, 11 March 2014, St. Petersburg Russia.
http://jimjansen.blogspot.com/2014/03/visit-to-yandex-headquarters-in-st.html

Presentation, Sungkyunkwan University (Sowan Campus), 20-21 June 2013, Seoul, South Korea.
http://jimjansen.blogspot.com/2013/06/research-workshop-discussion-on-web.html

Presentation, Library and Information Science Department and College of Information and Media, Duksung Women's College, 19 June 2013, Seoul, South Korea.
http://jimjansen.blogspot.com/2013/06/theoretical-constructs-of-searching-and.html

Presentation, Library and Information Science Department, College of Liberal Arts, Sungkyunkwan University, 18 June 2013, Seoul, South Korea.
http://jimjansen.blogspot.com/2013/06/keyword-advertising-research.html

Presentation, Qatar Computer Research Institute, 24-29 April 2013, Doha, Qatar.
http://jimjansen.blogspot.com/2013/04/research-presentation-to-folks-at-qatar.html

Presentation, Department of Decision Sciences, College of Business and Public Administration, Old Dominion University, 14-15 April 2013, Norfolk, VA.
http://jimjansen.blogspot.com/2013/04/keyword-advertising-presentation-to.html

Presentation, Google Online Marketing Challenge Workshop, The University of Illinois at Urbana–Champaign, 11 March 2013.
http://jimjansen.blogspot.com/2013/03/gomc-presentation-to-students-at.html

Keynote Presentation, Casual Living Conference 2012, 22-24 February 2012, Sarasota, FL.
http://accentsandfurnishings.com/conferences/casuallivingconference/2012/index.html

Keynote, The Direct Marketing Association of Washington (DMAW) Professor Institute. 3-4 January 2012, Washington. DC.
http://www.dmawef.org/Professors_Page/Professors_Page.html

Presentation, Advance 2011: Rediscovering the Customer. 20-22 September 2011, San Diego, CA. http://www.idanalytics.com/advance2011/

Webinar, Web Analytics Webinar for the American Society for Information Science and Technology, 17 June 2011. http://asist.org/Conferences/webinars/2011/web-analytics.html

Keynote Keynote, Buying and Selling eContent 2011. 28 March 2011, Scottsdale, AR. http://www.buy-sell-econtent.com/2011/Speakers/JimJansen.aspx

Presentation, Evri (semantic news aggregation company). 10 February 2011, Seattle, WA
http://jimjansen.blogspot.com/2011/02/visit-to-evri-semantic-news-aggregation.html

Presentation, IMPAQT (search engine marketing agency). 10 November 2010, Pittsburgh, PA. http://jimjansen.blogspot.com/2010/11/visit-to-search-engine-marketing.html

Invited Talks (Selected)

Presentation, Yahoo! Research Lab. 9 November 2010, New York, New York. http://jimjansen.blogspot.com/2010/11/visit-to-yahoo-research-labs-new-york.html

Presentation, School of Communication and Information, Rutgers University. 8 November 2010, New Brunswick, NJ.

University-wide Presentation, Ryerson University, 18 October 2009, Toronto, Canada.

Keynote

Presentation, Query Log Analysis: From Research to Best Practice 2009/ 27-28 May. London, UK. Funded by European Union project on Evaluation, Best Practices and Collaboration for Multilingual Information Access. http://ir.shef.ac.uk/cloughie/qlaw2009/index.html

Presentation, Query Log Analysis: From Research to Best Practice 2009/ 27-28 May. London, UK. Funded by European Union project on Evaluation, Best Practices and Collaboration for Multilingual Information Access. http://ir.shef.ac.uk/cloughie/qlaw2009/index.html

Presentation, Google. 30 October 2008. Mountain View, CA.

Presentation, IMPAQT (search engine marketing agency). 28 October 2008, Pittsburgh, PA. http://jimjansen.blogspot.com/2008/10/visit-to-sem-impaqt.html

Presentation, Mahalo (a human power search engine). 6 July 2008, Los Angeles, CA. http://jimjansen.blogspot.com/2008/07/mahalo-human-power-search-engine.html

Presentation, Pepperjam (search engine marketing agency). 24 June 2008, Wilkes-Barre, PA. http://jimjansen.blogspot.com/2008/06/visit-to-pepperjam.html

Presentation, School of Communication and Information, Rutgers University. 2 September 2005, New Brunswick, NJ.

Presentation, College of Information, University of North Texas, 15 June 1998. Denton, TX

Membership in Professional Societies

American Society for Information Science and Technology (ASIST)

Armed Forces Communications and Electronics Association (AFCEA)

Association for Computing Machinery (ACM)

The Institute of Electrical and Electronics Engineers (IEEE)
Societies: Computer Society

Professional Experience

Numerous **consulting projects** and **expert witnessing** (class action suits, patent ligation, and civil ligation)

US Army Officer (2002 – 1985): Held various command and staff positions of progressively increasing responsibility. Responsible for vision articulation, planning, directing, and day-to-day management of organizations ranging in size from 10 to over 200 personnel. Served in numerous locations in the United States, Europe, Central America, and the Far East as a communication officer. Responsible for the planning and installation of various types of communication systems including radio, telephone, computer and other digital networks. Served with the 8 h U.S. Army Y2K Operational Evaluation Team validating critical information management systems. Responsible for the long term planning, developing, and budgeting of communication systems of all types for the U.S. Forces stationed on the Korean Peninsula. Responsible for a 22-person division that develops photographic, graphical, audio-visual and multimedia material for the U.S. Army War College.

Security Clearance

TS-SCI: Cleared for Top Secret information and granted access to Sensitive Compartmental Information based on a single scope background investigation by the Defense Security Service, Office of Personnel Management on 17 March 2011.

Appendix B Testimony Cases

Year	Deliverables	Retained by	Case
2016	Testimony Deposition	Plaintiff	ERIN ANDREWS, Plaintiff, vs MARRIOTT INTERNATIONAL, INC., a Delaware Corporation; WESTEND HOTEL PARTNERS, LLC dba NASHVILLE MARRIOTT AT VANDERBILT UNIVERSITY, a Delaware Limited Liability Company, and MICHAEL DAVID BARRETT, an individual, Defendants. CASE NO. 11C4831, which is pending in the Circuit Court for Davidson County Tennessee at Nashville. Law Firm: Greene Broillet & Wheeler LLP
2015	Deposition	Plaintiff	ENCORE MEDIA METRICS, LLC fka SPUR DIGITAL L.P., dba SPUR INTERACTIVE and STEVE LATHAM VS ADOMETRY, INC. fka CLICK FORENSICS, INC. Cause 2012-44351 / Court: 281. (The District Court of Travis County, Texas.) Law Firm: Watts & Guerra LLP and DiNovo Price Ellwanger & Hardy LLP
2014	Deposition	Defendant	M.B. AS NEXT FRIEND OF J.B., A MINOR *Plaintiffs,* V. CAMP STEWART FOR BOYS, INC., AMERICAN INSTITUTE FOR FOREIGN STUDY, INC. D/B/A CAMP AMERICA, AND SCOTT ASH JAMES ZIRUS *Defendant.* NO. 5:12-CV-1133 (Western District of Texas) Law Firm: Rymer, Moore, Jackson, & Echols PC
2014	Testimony, Deposition	Defendant	REAL LOCAL PAGE PARTNERS, LLC, Claimant, v. PAYMENT ALLIANCE INTERNATIONAL, INC., Respondent & PAYMENT ALLIANCE INTERNATIONAL, INC. Counter-Claimant, v. REAL LOCAL PAGE PARTNERS, LLC, Counter-Respondent. CASE NO. 32 147 Y 0021413. AMERICAN ARBITRATION ASSOCIATION, MIAMI, FLORIDA Law Firm: Kirkland & Ellis LLP
2013	Deposition	Plaintiff	CABLE WHOLESALE.COM, INC. v. SF CABLE, INC. Case No. CV 11-2966 EMC (Northern District of California) Law Firm: Law Offices of James G. Schwartz P.C.

Appendix C Documents Referenced

Web Services

- Alexa www.alexa.com/
- Bing Search Engine https://www.bing.com/
- Compete https://www.compete.com/
- Google Keyword Tool https://adwords.google.com/KeywordPlanner
- Google Search Engine www.google.com/
- Google Trends https://www.google.com/trends/
- Microsoft Bing Keyword Tool www.bing.com/toolbox/keywords
- Million Short https://millionshort.com/
- SimiliarWeb www.similarweb.com/
- SpyFu www.spyfu.com/
- W3Snoop http://www.w3snoop.com/

Documents

- Agarwal, D., Chen, B. C., and Wang, X. *Multi-faceted ranking of news articles using post-read actions*. In Proc. of CIKM, ACM (2012), 694-703.
- Aikat, D. *News on the web: usage trends of an on-line newspaper*. Convergence: The International Journal of Research into New Media Technologies 4, 4 (Dec. 1998), 94-110.
- BBC News https://en.wikipedia.org/wiki/BBC_News
- Castillo, C., El-Haddad, M., Pfeffer, J., & Stempeck, M. (2014, February). *Characterizing the life cycle of online news stories using social media reactions*. In Proceedings of the 17th ACM conference on Computer supported cooperative work & social computing (pp. 211-223). ACM.
- Complaint, VIRGINIA L. GIUFFRE, Plaintiff, v. GHISLAINE MAXWELL, Defendant. CASE NO. 1:15-cv-07433
- Daily Mirror https://en.wikipedia.org/wiki/Daily_Mirror
- GIUFFRE001120
- GM_00068 (Gow E-Mail)
- http://digitalmeasurement.nielsen.com/files/metrics-guidelines.pdf
- http://www.ebizmba.com/articles/news-websites
- http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971
- http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
- http://www.pewresearch.org/fact-tank/2014/02/03/6-new-facts-about-facebook/
- https://www.google.com/advanced_search
- https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/
- Mail Online https://en.wikipedia.org/wiki/Mail_Online
- Power Law https://en.wikipedia.org/wiki/Power_law
- Snowball sampling https://en.wikipedia.org/wiki/Snowball_sampling

- Tatar, A., de Amorim, M. D., Fdida, S., & Antoniadis, P. (2014). A survey on predicting the popularity of web content. Journal of Internet Services and Applications, 5(1), 1.
- Teevan, J., Adar, E., Jones, R. and Potts, M. (2006). History repeats itself: repeat queries in Yahoo's logs. In *Proceedings of the 29th annual international ACM SIGIR conference on Research and development in information retrieval* (SIGIR '06). ACM, New York, NY, USA, 703-704.
- The Independent https://en.wikipedia.org/wiki/The_Independent
- The Times https://en.wikipedia.org/wiki/The_Times
- Triangulation (social science) http://en.wikipedia.org/wiki/Triangulation_%28social_science%29
- www.theguardian.com/media/2016/mar/17/independent-mirror-express-and-star-suffer-sharp-fall-in-traffic

EXHIBIT 25
(Filed Under Seal)

UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

VIRGINIA L. GIUFFRE. Plaintiff, v. GHISLAINE MAXWELL Defendants	15-cv-07433-RWS

EXPERT REPORT

OF

PETER KENT

OCTOBER 28TH, 2016

> *Slave, Virginia Roberts Lies, Virginia Giuffre Lies, Virginia Roberts Giuffre Lies, Virginia Roberts Untrue, Virginia Giuffre Untrue, Virginia Roberts Giuffre Untrue, Virginia Roberts Liar, Virginia Giuffre Liar, Virginia Roberts Giuffre Liar, Virginia Roberts Ross Gow, Virginia Giuffre Ross Gow, Virginia Roberts Giuffre Ross Gow, Virginia Roberts Ross dishonest, Virginia Giuffre Ross dishonest, Virginia Roberts Giuffre dishonest, victims refuse silence sex slave*

32. However, nowhere in his report does Mr. Anderson explain why these 26 search terms are important, beyond the fact that, he claims incorrectly, searching the major search engines with these phrases results in links to Web pages that contain allegedly defamatory material. However, this is true of literally thousands of different search phrases it's a simple task to create search terms to match particular pages but he never explains why these particular 26 phrases are relevant.

33. As I explain below in detail, Mr. Anderson's testimony is unreliable because it is *not* based on sufficient facts or data, nor is it the product of reliable principles and methods. Rather, it is seriously flawed in a number of ways.

1. Mr. Anderson's Choice of Search Terms Is Arbitrary

34. Mr. Anderson, in his report, provides a list of 26 search terms (Page 7) that appear to have been chosen in an arbitrary manner; furthermore, Mr. Anderson does not explain how these search terms are relevant to this case. Most of the examples are rarely if ever searched upon, and return few, if any, relevant results (that is, links to pages that discuss or recount Defendant's alleged defamatory statements).

35. Search terms are only relevant to this case if a searcher, wishing to find information about Plaintiff, would type the terms into a search engine. Mr. Anderson does not explain why such a person would type, for instance, the term *victims refuse silence sex slave*; in fact there seems no reason to believe that such a person would use this term. Why would someone wanting to research information about Plaintiff use the term *virginia roberts lies*, or *virginia roberts ross gow*? Mr. Anderson does not suggest any reason that somebody should use such terms. Indeed, these are terms unlikely to be used by anyone unfamiliar with this litigation or the fact that Defendant had denied Plaintiff's original allegations. These are not terms likely to be used by Mr. Anderson's "casual searcher" ("I conducted an investigation to determine the

106. However, this 3-step process (create pages, place them on Web sites, create links to the pages) is not very efficient, regardless of the fact that it is common in the ORM business. One should keep in mind that the primary goal of any business is maximizing profits, not efficiency. The 3-step process may be inefficient, but it has the advantage of increasing the income of ORM firms; rather than merely creating links, they can also charge for the creation and placement of Web pages. There is, however, an alternative strategy that some ORM firms in fact *do* use, as I describe later in this report.

2. The Problems With Mr. Anderson's Strategy

107. Mr. Anderson's strategy is unnecessarily expensive and complicated, for a number of reasons:

- Mr. Anderson exaggerates the number of Web pages (780) that must be pushed down in the search results
- Placing new Web pages on quality Web sites will be very difficult, and unnecessary
- Pushing the new Web pages up in the search results will be very difficult

a) Mr. Anderson Exaggerates the Number of Web Pages (780) That Must Be Pushed Down In The Search Results

108. Mr. Anderson has stated that 780 Web pages must be pushed down in the search results; he takes his 26 search phrases, and multiplies by 30 results (in theory 10 results per search-result page, over three pages, in order to push the "offending" pages down to the fourth page, though in some cases, in particular on Google, there may actually be fewer results on the first page, perhaps 8 or 9.) This is wrong for various reasons.

Most of the Search Terms Will be Used Infrequently If Ever

109. As noted earlier, most of Mr. Anderson's 26 search terms are infrequently if ever employed by searchers. Why, for instance, would it be necessary to push down offending Web pages in the results that the search engines provide for the term *victims refuse silence sex slave*, when this term is likely never used (and furthermore, that the search results contain no

EXHIBIT 26
(Filed Under Seal)

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

EXHIBIT 27
(Filed Under Seal)

Page: 1 Document Name: untitled

PANEL: ___ A07. ASSIGNMENT HISTORY YEAR: 16
T234 Monday May 23, 2016 9:04 am
STDT: [redacted] ROBERTS, VIRGINIA L SCHL: 3390 GR: 10 ST: I

A C	ENTRY CD	DATE	OD	WITHDRAWAL CD	DATE	P R	PF	SY	CL	DS	SCHL	DESC	GR	PRS	ABS	UNX	E Y
_	R02	101201	__	W26	030702	N	_	02	01	__	3390	SURVIVORS	10	56	31	___	Y
_	R02	092001	__	W02	101101	N	_	02	01	__	2331	ROYAL PALM HIG	10	13	1	___	_
_	EA1	081401	__	W32	092001	Z	_	02	A1	__	2192	WLLNGTN HS ADL	30	___	___	___	_
_	EA1	081600	__	W47	081301	Z	_	01	A1	__	2192	WLLNGTN HS ADL	30	___	___	___	Y
_	EA1	062100	__	W47	081500	Z	_	00	A1	__	2192	WLLNGTN HS ADL	30	___	___	___	Y
_	E01	081699	__	W03	081699	N	_	00	01	__	2331	ROYAL PALM HIG	10	___	___	___	_
_	E01	081998	__	W02	060999	P	_	99	01	__	0581	FOREST HILL HI	09	155	25	___	Y
_	E01	082097	__	W01	061098	R	_	98	01	__	2331	ROYAL PALM HIG	09	147	33	___	Y
_	E01	082097	__	W22	082097	N	_	98	01	__	2191	WELLINGTON HIG	09	___	___	___	_
_	R03	040797	__	W02	061197	P	_	97	01	__	1691	CRESTWOOD MID	08	40	5	___	Y
_	E01	082294	__	DNE	082294	N	_	95	01	__	1703	ROYAL PINES SC	06	___	___	___	_
_	E01	082393	__	W02	061094	P	_	94	01	__	1901	LOXAHATCHEE EL	05	167	13	___	Y
_	E01	082592	__	W01	061193	P	_	93	01	__	1901	LOXAHATCHEE EL	04	176	4	___	Y

PF1=HELP 3=EXIT 5=REFRESH 7=BKWD 8=FWD 9=NEXT PAGE 12=ESCAPE
PAGE FULL...CONTINUE. TERML: I1B5

TO - DISTRICT: 0000050 PALM BEACH SCHOOL DISTRICT SCHOOL: 3390 COURSE INFORMATION FILE: SRTS121S PAGE 3
GRADE LEVEL: 10 PREPARED DATE: 05/23/2016 CURRENT DISTRICT: 50 PALM BEACH SCHOOL
CURRENT SCHOOL: 3390 SURVIVORS CHARTER SCHOOL

LEGAL NAME: ROBERTS, VIRGINIA L

DISTRICT: 50 SCHOOL: 0581 FOREST HILL HIGH
YEAR: 1998-1999 GRADE LEVEL: 09

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	G R	A C	O N	CREDIT ATT.	/EARN
1	0500500	PERS,CAR,SCH DEV 1	EL		B	Z	N	0.50	0.50
1	0701320	FRENCH 1	FL	RJ	C	Z	N	0.50	0.50
1	1001340	ENG 2	EN	RJ	A	Z	N	0.50	0.50
1	1200380	ALG 1-B	MA	JR	F	Z	N	0.50	0.00
1	1900300	DRIVER ED CLASS	EL		B	Z	N	0.50	0.50
1	2000310	BIO 1	SC	RJ	A	Z	N	0.50	0.50
1	2109310	WORLD HIST	WH	RJ	C	Z	N	0.50	0.50
2	0500500	PERS,CAR,SCH DEV 1	EL		F	Z	N	0.50	0.00
2	0701320	FRENCH 1	FL	RJ	F	Z	N	0.50	0.00
2	0800300	HEALTH1-LIF MGMT SK	LM	RJ	F	Z	N	0.50	0.00
2	1001340	ENG 2	EN	RJ	F	Z	N	0.50	0.00
2	1200380	ALG 1-B	MA	JR	F	Z	N	0.50	0.00
2	2000310	BIO 1	SC	RJ	F	Z	N	0.50	0.00
2	2109310	WORLD HIST	WH	RJ	F	Z	N	0.50	0.00
		CREDIT, TERM:						7.00	3.00

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.2857	9.00	CUM:	1.5714	22.00
STATE-TERM:	1.2857	9.00	CUM:	1.5714	22.00

1998-1999 ANNUAL DAYS-PRESENT: 155 ABSENT: 25
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
ACADEMICALLY PROMOTED

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 1999-2000 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

1999-2000 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 NO COURSES TAKEN
YEAR: 2000-2001 GRADE LEVEL: NA

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

2000-2001 ANNUAL DAYS-PRESENT: 0 ABSENT: 0
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
PROMOTION STATUS NOT APPLICABLE

DISTRICT: 50 SCHOOL: 3390 SURVIVORS CHARTER SCHOOL
YEAR: 2001-2002 GRADE LEVEL: 10

T	COURSE#	COURSE TITLE	SUBJECT AREA	CRSE FLAG	G R	A C	O N	CREDIT ATT.	/EARN
1	0500530	PERS,CAR,SCH DEV 4	EL		C	Z	N	0.50	0.50
1	1001440	BUS ENG I	EN	J	B	Z	N	0.50	0.50
1	1205370	CONSUMER MATH	MA	C	C	Z	N	0.50	0.50
1	8300310	WORKPLACE ESSENTIAL	VO		B	Z	N	0.50	0.50
1	8301610	WORK EXP 1	VO		F	Z	N	0.50	0.00
1	8301650	WORK EXP-OJT	VO		F	Z	N	1.00	0.00
		CREDIT, TERM:						3.50	2.00

	GPA	QTY PTS		GPA	QTY PTS
DISTRICT-TERM:	1.4286	5.00	CUM:	1.5429	27.00
STATE-TERM:	1.4286	5.00	CUM:	1.5429	27.00

2001-2002 ANNUAL DAYS-PRESENT: 69 ABSENT: 32
SUMMER TERMS DAYS-PRESENT: 0 ABSENT: 0
NOT ENROLLED IN DISTRICT K-12 AT END OF SCHOOL YEAR

EXHIBIT 28
(Filed Under Seal)

IMPORTANT MESSAGE

FOR J. E.

DATE 2/27/05 TIME 10:18 A.M. / P.M.

M

OF Ms. Maxwell

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She is home

SIGNED J.

1184

IMPORTANT MESSAGE

FOR J. E.

DATE 2/26/05 TIME 4:40 A.M. / (P.M.)

M Geon Luc

OF

PHONE/ MOBILE no phone #

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please!

Call him

SIGNED J.

1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 2/28/05 TIME 12:30 A.M. / (P.M.)

M

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She is wondering if 2:30 is ok cuz she needs to stay in school

IMPORTANT MESSAGE

FOR Jeffrey

DATE 02/27/05 TIME 07:45 A.M. / (P.M.)

M Jean Luc

OF

PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE That he called back

SAO01067

IMPORTANT MESSAGE

FOR J.E.

DATE 9/4/05 TIME 3:40 A.M. P.M.

M

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED J.

1184

IMPORTANT MESSAGE

FOR Ms. G. Maxwell

DATE 9/4/05 TIME 1:40 A.M. P.M.

M [redacted]

OF

PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She will be here at 3pm with somebody.

SIGNED L.

1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/4/05 [redacted] TIME 7:25 A.M. P.M.

M [redacted]

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Canceled [redacted]
She would like to speak
to you. I belive about
college [redacted]

Shoul I schedule any
one else?

SIGNED J

1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein

DATE 9/4/05 TIME 2:08 A.M. P.M.

M

OF

PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SAO01089

SIGNED L

1184

IMPORTANT MESSAGE

FOR: J.E.

DATE: 9/10/05 TIME: 5:40 P.M.

M: [redacted]

OF:

PHONE/MOBILE:

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: I went to Sarah and made her water bottle and I went work out with G.M.

SIGNED: J.

1184

IMPORTANT MESSAGE

FOR:

DATE: TIME: A.M. P.M.

M:

OF: LADA

PHONE/MOBILE:

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: The UNFINISHED LIFE is not playing yet. I got tickets for the Broken Flowers @ 9:30

SIGNED:

1184

IMPORTANT MESSAGE

FOR: J.E.

DATE: 9/10/05 TIME: 5:55 P.M.

M: [redacted]

OF:

PHONE/MOBILE:

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: She got messages she talk with Miles She will be at 12:30

SIGNED: J.

1184

IMPORTANT MESSAGE

FOR: JE

DATE: TIME: A.M. P.M.

M:

OF: Douglas

PHONE/MOBILE:

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: GM asked him to call. Review the report reg. the floor. It takes several days to dry...

SIGNED:

SA001092

..84

IMPORTANT MESSAGE

FOR J. E.

DATE 9/11/05 TIME 9:15 A.M.

M [redacted]

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I got a car for ...

SIGNED J.

1184

IMPORTANT MESSAGE

FOR JE

DATE TIME A.M. P.M.

M

OF N

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE [redacted] hasn't confirmed [redacted] @11.00 yet so she is keeping [redacted] on hold in case [redacted] doesn't call back

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. J. Epstein

DATE 9/11/05 TIME 10:01 A.M.

M George Goldsmith

OF

PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED L

1184

IMPORTANT MESSAGE

FOR J. E.

DATE 9/10/05 TIME 10:10 P.M.

M [redacted]

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE [redacted] will be at 11:AM Do you want me to cancel [redacted]

SAO01093

SIGNED J.

1184

IMPORTANT MESSAGE

FOR J. E.
DATE 2/27/05 TIME 10:18 A.M. P.M.
M
OF Ms. Maxwell
PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She is home

SIGNED J.

1184

IMPORTANT MESSAGE

FOR J. E.
DATE 2/26/05 TIME 4:40 A.M. P.M.
M Geon Luc
OF
PHONE/ MOBILE no phone #

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please! Call him

SIGNED J.

1184

COPY

IMPORTANT MESSAGE

FOR Jeffrey
DATE 2/28/05 TIME 12:30 A.M. P.M.
M
OF
PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She is [illegible] if 2:30 is ok cuz she needs to stay in schooll

SIGNED

1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 02/27/05 TIME 07:45 A.M. P.M.
M Jean Luc
OF
PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE That he called back

SAO01446

SIGNED

1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/4 TIME 9:05 A.M.

M [redacted]

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE - confirmed at 11:00 AM - 4:30 PM

SIGNED

1184

IMPORTANT MESSAGE

FOR Jess Staley

DATE 09/03/05 TIME 4:40 P.M.

M

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR J.E.

DATE 9/4/05 TIME 9:08 A.M.

M [redacted]

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE It is O.K. for [redacted] to stop by and drop something?

SIGNED J.

1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE 09/03/05 TIME 4:40 P.M.

M [redacted]

OF

PHONE/ MOBILE [redacted]

TELEPHONED		PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SAO01450

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 11/08/04 TIME 1:10 A.M. P.M.

M S

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

Please call her.

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. J.E.

DATE 11/08/04 TIME 1:15 A.M. P.M.

M

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

I have a Female for him!

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE TIME 11:45 A.M. P.M.

M

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE TIME 6:45 A.M. P.M.

M David Grosof

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SA001452

SIGNED

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR Mr. J. E

DATE 1/23/05 TIME 10:30 A.M. P.M.

M

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please call her.

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. J. E

DATE 1/23/05 TIME 10:10 A.M. P.M.

M

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE This is her new cell number. Please call her

SIGNED

1184

IMPORTANT MESSAGE

FOR J E.

DATE 1/29/05 TIME 9:00 A.M. P.M.

M Telcr 2

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please call her back

SIGNED

1184

IMPORTANT MESSAGE

FOR J. E

DATE 1/29/05 TIME 6:10 A.M. P.M.

M

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE 'I have a female for him'

SAO01455

SIGNED

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR J. E

DATE 9/3/05 TIME 8:50 A.M. P.M.

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I left message for [REDACTED] to confirm for 11^{00} AM and [REDACTED] for 4:30 PM

SIGNED T. 1184

IMPORTANT MESSAGE

FOR J. E.

DATE 8/22/05 TIME 9:20 A.M. P.M.

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED T. 1184

IMPORTANT MESSAGE

FOR J. E

DATE 9/4/05 TIME 12:55 A.M. P.M.

M [REDACTED]

OF [REDACTED]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She would like to reschedule her time

SIGNED T. 1184

IMPORTANT MESSAGE

FOR J. E.

DATE 8/22/05 TIME A.M. P.M.

M G M

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SA001477

SIGNED T. 1184

SC1184 10/01

IMPORTANT MESSAGE

FOR Mr Epstein

DATE 02/02/03 TIME 8:54 A.M.

M

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Called for. Please call back, it's very important

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE 01/02/03 TIME 16:30 P.M.

M

TELEPHONED	✓	PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED GM

1184

IMPORTANT MESSAGE

FOR GM

DATE TIME A.M. P.M.

M

OF

PHONE AREA CODE NUMBER EXTENSION

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

PHONED TO CONFIRM 10 AM

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE 01/02/03 TIME 21:06 A.M. P.M.

M

TELEPHONED	✓	PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE WANTS TO KNOW IF SHE SHOULD BRING HER FRIEND WITH TONIGHT

SIGNED Michael

1184

SAO01456

item # 2 book 3

IMPORTANT MESSAGE

FOR Jeffrey

DATE [redacted] TIME 5:11 P.M.

M [redacted]

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE has girl for tonight

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. Epstein

DATE 9/24/04 TIME 5:20 P.M.

M r. Mark Epstein

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

Call me in New York

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. Epstein

DATE 9/24/04 TIME 5:29 P.M.

M r. Leon Black [illegible]

MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Will Be available At This Number For 30 min. Otherwise Tomorrow 9 Am To 1:00 Pm

SIGNED

1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE TIME 1230 A.M.

Dr. moushwits

MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

SAO01457

SIGNED

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR SARAH

DATE 07/10/04 TIME 6.33 A.M. P.M.

M

OF RAGHU

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE PL CALL

SIGNED

1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE TIME A.M. P.M.

M CECILIA (OFFICE)

OF

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR SARAH

DATE 7/9/04 TIME A.M. P.M.

M MILES

TELEPHONED	✓	PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE [illegible] PLEASE [illegible] BACK [illegible]

SIGNED R

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 7/9/04 TIME 7.50 A.M. P.M.

M

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

IS AVAILABLE ON TUESDAY NO ONE FOR TOMORROW

SIGNED R

SA001461

SC1184 10/01

IMPORTANT MESSAGE

FOR JE

TIME 10 A.M.

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR SARAH.

DATE 7/17/04 TIME 8:02 A.M. P.M.

M

OF GEORGE

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE "I AM JET-LAG AND NODDING OFF. JUST SAY I CALLED HER."

SIGNED Ru

1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 7/17/04 TIME 6.55 A.M. P.M.

M

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

CAN COME TOMORROW ANY TIME OR ALONE

SIGNED Ru

1184

IMPORTANT MESSAGE

FOR SARAH OR MR EPSTEIN

DATE 07/17/04 TIME 6.45 A.M. P.M.

M

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE 'WAS IN A CAR ACCIDENT ON HER WAY SO CAN NOT COME. SHE JUST GOT BACK

SAO01462

SIGNED Ru

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR: JEFFREY

DATE: AUG 2 TIME: 12:45 A.M./P.M.

M: [redacted]

OF:

PHONE/MOBILE: [redacted]

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: THEY ARE AVAILABLE ALL WEEKEND AND [crossed out] MAYBE [redacted] [illegible]

SIGNED: [redacted]

1184

IMPORTANT MESSAGE

FOR: MR EPSTEIN

DATE: 7/25/04 TIME: 5:02 A.M./P.M.

M:

OF: SNYDER

PHONE/MOBILE: [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: "RETUNING YOUR CALL"

SIGNED: Ku

1184

IMPORTANT MESSAGE

FOR: SARA.

DATE: Aug. 2 TIME: 2:00 A.M./P.M.

OF:

PHONE/MOBILE: [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	✓

MESSAGE: Please Call IN Reference to [illegible] the [illegible] [illegible] [illegible] I [illegible] them per Ms Maxwell's request.

SIGNED: [redacted]

1184

IMPORTANT MESSAGE

FOR: MR. EPSTEIN

DATE: 7/25/04 TIME: 1:48 A.M./P.M.

M:

OF: MS MAXWELL

PHONE/MOBILE:

TELEPHONED	✓	PLEASE CALL	✓
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE: "TELL HIM TO CALL ME"

SA001464

SIGNED: Ku

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR J.E.

DATE 8/20/05 TIME 8:45 A.M. P.M.

M Tony

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED J.

1184

IMPORTANT MESSAGE

FOR J.E

DATE 8/20/05 TIME 12:40 A.M. P.M.

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Please call him

SIGNED J

1184

IMPORTANT MESSAGE

FOR J.E.

DATE 8/20/05 TIME 8:50 A.M. P.M.

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

ME[SSAGE] - confirmed at 4 PM

Who is scheduled for morning? I belive wants to work.

SIGNED J.

1184

IMPORTANT MESSAGE

FOR J.E.

DATE 8/20/05 TIME 7:30 A.M. P.M.

M Sarah

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL	X	SPECIAL ATTENTION	

MESSAGE

SA001476

SIGNED J

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR J. E

DATE 9/3/05 TIME 8:50 A.M. P.M.

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I left message for [redacted] to confirm for 11^{00} AM and [redacted] for 4:30 PM

SIGNED T.

IMPORTANT MESSAGE

FOR J. E.

DATE 8/22/05 TIME 9:20 A.M. P.M.

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED T.

IMPORTANT MESSAGE

FOR J. E

DATE 9/4/05 TIME 12:55 A.M. P.M.

M [redacted]

OF [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She would like to reschedule her time

SIGNED T.

IMPORTANT MESSAGE

FOR J. E.

DATE 8/22/05 TIME A.M. P.M.

M G M

OF

PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SAO01477

SIGNED T.

SC1184 10/01

IMPORTANT MESSAGE

FOR Jeffrey

TIME 5:11 P.M.

M [redacted]

OF [redacted]

PHONE/MOBILE [redacted]

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE has girl for tonight

SIGNED

1184

IMPORTANT MESSAGE

FOR Mr. Epstein

DATE 4/24/04 TIME 8:29 P.M.

M R. Mark Epstein

OF

PHONE/MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

Call me in New York

SIGNED

1184

IMPORTANT MESSAGE

FOR MR Epstein

DATE 4/24/04 TIME 5:29 P.M.

M R Ladenson

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Will Be available At This Number For 30 min. Otherwise Tomorrow 9 AM - To 1:00 PM

SIGNED

1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE TIME 1230 P.M.

M Dr. mouskwits

OF

PHONE/MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE [redacted]

SAO2828

SIGNED

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR Jeffrey
DATE
TIME 4:56 A.M. P.M. (circled)
M
OF
PHONE/MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

[redacted] is availible at 9:00

SIGNED
1184

IMPORTANT MESSAGE

FOR MS MAXWELL
DATE 4/25/04 TIME 9:50 A.M. (circled) P.M.
M LARRY
OF [redacted]
PHONE/MOBILE [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE Returning call

SIGNED
1184

IMPORTANT MESSAGE

FOR
DATE
TIME
A.M. P.M.
M
OF
PHONE/MOBILE

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED
1184

IMPORTANT MESSAGE

FOR MR EPStein
DATE 4/25/04 TIME 9:08 A.M. (circled) P.M.
M EVA DuBin
OF [redacted]
PHONE/MOBILE [redacted]

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SAO2829

SIGNED
1184

IMPORTANT MESSAGE

FOR GM

DATE 7/28/04 TIME 2:00 A.M. P.M.

M Martha

OF Colonial Bank

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR MS. MAXWELL

DATE 04/25/04 TIME 6:55 A.M. P.M.

MS. [redacted]

OF

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE RETURNIN YOUR CALL

SIGNED Rushi

1184

IMPORTANT MESSAGE

FOR

DATE TIME A.M. P.M.

M [redacted]

TELEPHONED		PLEASE CALL	X
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR Jeffrey

DATE TIME A.M. P.M.

M Ghislaine

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE would be helpful to have [illegible] come to Palm Beach today to stay here and help train new staff with Ghislaine

SAO2830

SIGNED

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 5.3.04 TIME 7 A.M. ~~P.M.~~

M

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE THERE IS A BEEP - CONTINOUS COMING FROM COMPUTER IN CABANA

SIGNED LUCIAN

1184

IMPORTANT MESSAGE

FOR MR EPSTEIN

DATE 5.2.04 TIME 4.15 ~~A.M~~ P.M.

OF [redacted]

PHONE/ MOBILE [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE CALLED

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE TIME 5.14 A.M. (P.M.)

M Jeanluc

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE He just did a good one - 18 years - (She spoke to me & said "I love Jeffrey")

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE TIME 9:15 A.M (P.M.) Monday night

M Eva

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SA02832

SIGNED

1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE ______ TIME 1:00 A.M. P.M.

M Darren

OF

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE He said that he got a call From Byron

SIGNED

1184

IMPORTANT MESSAGE

FOR MR. EPSTEIN

DATE 7/6 TIME 8:00 A.M. P.M.

M DARREN

OF

PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED

1184

IMPORTANT MESSAGE

FOR JE

DATE 6 JULY TIME 4.20 A.M. (P.M.)

M

OF [illegible] [redacted]

PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE I need a work I need [illegible], I don't have money [illegible] Do you have some work for me?

SIGNED

1184

IMPORTANT MESSAGE

FOR Sarah

DATE ______ TIME 5:10 A.M. P.M.

M

OF [redacted]

PHONE/ MOBILE [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SAO2838

SIGNED

1184

SC1184 10/01

IMPORTANT MESSAGE

FOR MR EPSTEIN
DATE TIME 2:45 A.M. P.M.
M MS. MAXWELL
OF
PHONE/ MOBILE

TELEPHONED	✓	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

SIGNED 1184

IMPORTANT MESSAGE

FOR JE.
DATE TIME 9:2 A.M. P.M.
M Sarah
OF [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She said if she can't [illegible] her left before [illegible] and closer after 4:00 (6:00 or 7:00) b'coz she has b-day dinner w/ her grandpa

SIGNED 1184

IMPORTANT MESSAGE

FOR MR EPSTEIN
DATE [redacted] TIME A.M. P.M.
OF [illegible]
PHONE/ MOBILE [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE she will see you at 7:30

SIGNED 1184

IMPORTANT MESSAGE

FOR MR. Epstein
DATE [redacted] TIME 2:48 A.M. P.M.
M [redacted]
OF
PHONE/ MOBILE

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She said that sophie got her messages & said that she's sorry for not seeing you in California

SAO2850

SIGNED 1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 4/1/05 TIME 8:08 A.M. P.M.
M Jean-Luc
OF [redacted]
PHONE/ MOBILE [redacted]

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE He has a teacher for you to teach you how to speak Russian. She is 2x8 years old not Blonde. Lessons are free and you can have 1st today if you call

SIGNED

1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/31/05 TIME 5:06 A.M. P.M.
M [redacted]
OF [redacted]
PHONE/ MOBILE [redacted]

TELEPHONED		PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She called if you would like for her to work. She is available tom. till noon and Mon - Fri

SIGNED

1184

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/31/05 TIME 3:22 A.M. P.M.
M [redacted]
OF [redacted]
PHONE/ MOBILE [redacted]

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE

IMPORTANT MESSAGE

FOR Jeffrey
DATE 3/31/05 TIME 2:40 A.M. P.M.
M Cecilia
OF
PHONE/ MOBILE

TELEPHONED	X	PLEASE CALL	
CAME TO SEE YOU		WILL CALL AGAIN	
WANTS TO SEE YOU		RUSH	
RETURNED YOUR CALL		SPECIAL ATTENTION	

MESSAGE She had Martin Novak on the phone

SAO3008

EXHIBIT 29
(Filed Under Seal)

EXHIBIT 30
(Filed Under Seal)

U.S. Department of Justice

United States Attorney
Southern District of Florida

500 South Australian Ave., Suite 400
West Palm Beach, FL 33401
(561) 820-8711
Facsimile: (561) 820-8777

September 3, 2008

VIA COURIER
Ms. Virginia Roberts
c/o Asst Legal Attache Matthew Witt
United States Embassy
Sydney
Australia

Re: **Jeffrey Epstein/Virginia Roberts: NOTIFICATION OF IDENTIFIED VICTIM**

Dear Ms. Roberts:

By virtue of this letter, the United States Attorney's Office for the Southern District of Florida provides you with the following notice because you are an identified victim of a federal offense.

On June 30, 2008, Jeffrey Epstein (hereinafter referred to as "Epstein) entered a plea of guilty to violations of Florida Statutes Sections 796.07 (felony solicitation of prostitution) and 796.03 (procurement of minors to engage in prostitution), in the 15th Judicial Circuit in and for Palm Beach County (Case Nos. 2006-cf-009454AXXXMB and 2008-cf-009381AXXXMB) and was sentenced to a term of twelve months' imprisonment to be followed by an additional six months' imprisonment, followed by twelve months of Community Control 1, with conditions of community confinement imposed by the Court.

In light of the entry of the guilty plea and sentence, the United States has agreed to defer federal prosecution in favor of this state plea and sentence, subject to certain conditions, including the following:

1. An independent Special Master was assigned the task of selecting an attorney representative to represent the victims, including you, in connection with civil actions between the victims and Mr. Epstein. The

Special Master selected Robert Josefsberg, Esq. of the firm Podhurst Orseck, P.A., a highly-respected and experienced attorney. You are not obligated to use Mr. Josefsberg as your civil attorney, but, as explained in greater detail below, Mr. Josefsberg's services will be provided at no cost to you because Mr. Epstein is obligated to pay the costs and fees of the attorney-representative. Also, Mr. Epstein and his attorneys can only contact you via Mr. Josefsberg, assuming that you would like Mr. Josefsberg to serve as your attorney.

2. If you elect to file suit against Mr. Epstein pursuant to Title 18, United States Code, Section 2255, Mr. Epstein will not contest the jurisdiction of the United States District Court for the Southern District of Florida over his person and/or the subject matter, and Mr. Epstein waives his right to contest liability and also waives his right to contest damages up to an amount as agreed to between you and Mr. Epstein, so long as you elect to proceed exclusively under 18 U.S.C. § 2255, and you waive any other claim for damages, whether pursuant to state, federal, or common law. Notwithstanding this waiver, Epstein's agreement with the United States, his waivers and failure to contest liability and such damages in any suit are not to be construed as an admission of any criminal or civil liability.

3. As stated above, Mr. Epstein has agreed to pay the fees of the attorney representative selected by the independent third party. This provision, however, shall not obligate Epstein to pay the fees and costs of contested litigation filed against him. Thus, if after consideration of potential settlements, you and Mr. Josefsberg elect to file a contested lawsuit pursuant to 18 U.S.C. § 2255 or you elect to pursue any other contested remedy, the obligation to pay the costs of the attorney representative, as opposed to any statutory or other obligations to pay reasonable attorneys fees and costs such as those contained in Section 2255, shall cease.

Please contact either myself at ann.marie.c.villafana@usdoj.gov, or Justice Department Victim-Witness Specialist Twiler Smith at Twiler.Smith@ic.fbi.gov with a good telephone number and/or e-mail address, so that we may provide Mr. Josefsberg with a timely means of communicating with you. If you would like to contact Mr. Josefsberg

directly, he can be reached at +1 305 358-2800.

If you have already selected other counsel to represent you, or if you do so in the future, and you decide to file a claim against Jeffrey Epstein, Mr. Epstein's attorney, Jack Goldberger, asks that you have your attorney contact Mr. Goldberger at Atterbury Goldberger and Weiss, 250 Australian Avenue South, Suite 1400, West Palm Beach, FL 33401, (561) 659-8300.

In addition, there has been litigation between the United States and two other victims regarding the disclosure of the entire agreement between the United States and Mr. Epstein. Mr. Josefsberg can provide further guidance on this issue, or if you select another attorney to represent you, that attorney can review the Court's order in the matter of *In re Jane Does 1 and 2*, United States District Court for the Southern District of Florida Court File No. 08-80736-CIV-MARRA.

Please understand that neither the U.S. Attorney's Office nor the Federal Bureau of Investigation can take part in or otherwise assist in civil litigation. Thank you for all of your assistance during the course of the federal and state investigations and please accept the heartfelt regards of myself and Special Agents Kuyrkendall, Slater, and Richards for your health and well-being.

Sincerely,

R. Alexander Acosta
United States Attorney

By: [signature]
A. Marie Villafaña
Assistant United States Attorney

cc: Robert Josefsberg, Esq.
Jack Goldberger, Esq.

EXHIBIT 31
(Filed Under Seal)

FEDERAL BUREAU OF INVESTIGATION

Date of entry 07/05/2013

VIRGINIA L. GIUFFRE, maiden name ROBERTS, date of birth [redacted] Social Security Account Number [Social Security Number] United States Citizen and Australian Permanent Resident, residence [redacted] New South Wales, Australia, 2261 was interviewed at the United States Consulate in Sydney, Australia. GIUFFRE was advised of the identity of the interviewing agents and purpose of the interview. Present during the interview was Federal Bureau of Investigation Special Agent [redacted] [redacted] and via telephone, Assistant United States Attorney [redacted] GIUFFRE provided the following information:

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GIUFFRE was born in Sacramento, California to parents [redacted] [redacted] date of birth [redacted] currently resides in [redacted] and [redacted] date of birth [redacted] currently resides in [redacted] GIUFFRE moved to Palm Beach County, Florida with her parents when she was four years old and returned to California at age 11. She returned to Florida at age 13 and was placed in a rehabilitation or foster care facility in West Palm Beach, Florida.

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GIUFFRE ran away from the rehabilitation facility when she was approximately 14 years old, and while living on the streets in Miami, Florida, she met [redacted] [redacted] [redacted] [redacted] [redacted] was training GIUFFRE to be an escort [redacted] [redacted] gave GIUFFRE a life off of the streets which made her feel

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Investigation on 03/17/2011 at Sydney, Australia (In Person)

File # 31E-MM-108062 Date drafted 07/05/2013

by [redacted]

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like she was locked into the relationship. [redacted] gave GIUFFRE pharmaceutical drugs toward the end of their relationship.

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GIUFFRE's relationship with [redacted] ended while she was at a private ranch near Ocala, Florida. GIUFFRE telephonically contacted a childhood friend, [redacted] from a telephone at the ranch. GIUFFRE knew [redacted] from elementary school and called him at the home telephone of his parents [redacted] GIUFFRE told [redacted] she was very lonely, and [redacted] asked her why she did not leave [redacted] GIUFFRE's telephone conversation with [redacted] the recreational vehicle (RV) GIUFFRE was staying in at the ranch [redacted] did not strike her [redacted] pack her belongings and told her she was going to live with another man.

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[redacted] GIUFFRE felt that she was sent to [redacted] but did not know the specifics of the arrangement. GIUFFRE engaged in sexual activity with [redacted] who was described as a white male [redacted] GIUFFRE stated [redacted] GIUFFRE stayed with [redacted] LNU for approximately one or two weeks before the police located her and returned her to her parents. GIUFFRE was interviewed by a male detective. GIUFFRE's parents were still married at the time and lived near [redacted] Florida. GIUFFRE believed there was an FBI investigation related to [redacted] She never saw [redacted] again after [redacted]

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In approximately June 1998 or 1999, GIUFFRE began working at Donald Trump's Mar-A-Lago Club in Palm Beach, Florida. GIUFFRE's father [redacted] was able to help her gain employment as a baby sitter and later as a locker room attendant at the club. GIUFFRE started studying for her GED and wanted to become a massage therapist. In August, GIUFFRE was reading an anatomy/massage book and was approached by [redacted] and help her get her masseuse accreditation. [redacted]

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GIUFFRE consulted her father about the opportunity and at approximately 5:00 p.m. the same day, her father drove her to a residence at [redacted]

[redacted] Florida. [redacted] spoke with GIUFFRE's father and told him it was a wonderful opportunity for GIUFFRE. GIUFFRE met [redacted] [redacted] also known as [redacted] GIUFFRE was led upstairs [redacted]

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Once upstairs in [redacted] [redacted] instructed GIUFFRE to wash her hands prior to beginning the massage. The massage began [redacted] demonstrated massage techniques to GIUFFRE.

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During the course of the massage, [redacted] questioned GIUFFRE about her past, including her time as a runaway. GIUFFRE was also asked if she took birth control.

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GIUFFRE was given instruction and began kissing [redacted]

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At the conclusion, [redacted] instructed GIUFFRE to obtain two warm wash clothes. One wash cloth was used to clean [redacted] second was [redacted] to help him relax. GIUFFRE described [redacted] and GIUFFRE then moved to the steam room and shower where GIUFFRE massaged [redacted] with soap and a loofah in the shower.

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At the conclusion of the shower, GIUFFRE went downstairs and [redacted] Arrangements were made for GIUFFRE to return to the house the following day after work. GIUFFRE's cellular phone number was given to [redacted]

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The same routine and pattern of massages and sexual activity between [redacted] and GIUFFRE continued for between one and two weeks. At times, [redacted] offered GIUFFRE the option to quit her job at Mar-A-Lago and travel [redacted] There was also discussion of GIUFFRE receiving massage training. GIUFFRE was to be paid $200.00 per day for travel and $200.00 per hour for massages.

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Early in her relationship with [redacted] GIUFFRE met [redacted] and was introduced as [redacted] assistant.

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GIUFFRE soon began traveling [redacted] For the initial six months, GIUFFRE traveled [redacted] around the United States and Caribbean, including California, New York City, New Mexico, and various business trips. During those trips, [redacted]

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Six to nine months after GIUFFRE began working for [redacted] GIUFFRE was introduced to [redacted] LNU, [redacted] in [redacted] Florida. [redacted] at the time. GIUFFRE met the couple at a condominium next to the [redacted] The condominium was bought [redacted] and was a [redacted] In the condominium, GIUFFRE provided a normal massage to [redacted] LNU. Shortly thereafter, [redacted] LNU [redacted] GIUFFRE provided an erotic massage to [redacted] GIUFFRE and [redacted] GIUFFRE cleaned [redacted] She was paid cash [redacted] In addition, [redacted] paid GIUFFRE [redacted] GIUFFRE was 16 years old at the time [redacted]

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GIUFFRE advised [redacted] introduced her to the drug Xanax. She explained that Xanax helped her escape from reality but allowed her to still function normally. Xanax helped her go forward with what she was doing with [redacted] and others. Her habit went from two pills per day up to eight pills per day.

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GIUFFRE's second client was an academic of some sort described as an older American male [redacted] sent GIUFFRE from Miami International Airport to [redacted] by commercial airline. GIUFFRE was picked up at the airport by [redacted] and then taken to the island by boat. GIUFFRE

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pointed out that [redacted] instructed GIUFFRE to entertain the client [redacted] and wanted to ride jet skis and participate in other island activities [redacted] GIUFFRE spent two days on the island with the client. GIUFFRE assumes the client also traveled [redacted] commercially.

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During the following several months, GIUFFRE traveled internationally [redacted] Prior to her traveling abroad, [redacted] assisted GIUFFRE in getting her passport. GIUFFRE got passport photographs of herself and provided them to [redacted] The remaining paperwork was taken care of by [redacted] GIUFFRE traveled to Paris, France, the South of France, London, England, Africa, and Spain. While in Paris, GIUFFRE recalled staying at a hotel overlooking the Champs-Elysees. While traveling [redacted] GIUFFRE traveled on [redacted] a black plane. During the international travel, [redacted] At times, GIUFFRE would [redacted] Rarely a day would pass [redacted]

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[redacted] contacted GIUFFRE through [redacted] and wanted to talk to GIUFFRE about [redacted] and offered GIUFFRE a contract. GIUFFRE agreed to the contract for her story and was paid $140,000 for the story, $10,000 when the article was printed, and another $10,000 to be wired into GIUFFRE's account in May 2011. The contract prevented GIUFFRE from talking to any other press for a specified period. GIUFFRE advised that she provided [redacted] with detailed information [redacted]

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At age 16, GIUFFRE met GIUFFRE believed she and were approximately the same age. GIUFFRE and

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GIUFFRE would dress

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GIUFFRE, though explained GIUFFRE provided an GIUFFRE described

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An unknown individual GIUFFRE saw when she arrived at GIUFFRE had GIUFFRE said that day was a low stage in her relationship because she could not believe GIUFFRE never

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saw [redacted] GIUFFRE believed the girls may have been [redacted] but GIUFFRE was not certain of [redacted] involvement.

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GIUFFRE had a picture of herself she wanted to give [redacted]

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GIUFFRE described some of the unique interior areas of [redacted] which GIUFFRE referred to [redacted] which was where GIUFFRE stayed. [redacted]

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While in New York, GIUFFRE also stayed at an apartment on 66th street [redacted] GIUFFRE was aware of [redacted] additional apartments in the same building. According to [redacted] the apartment building on 66th street was owned by [redacted] GIUFFRE advised that she had a photograph of the interior of the 66th Street apartment among other photos [redacted]

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GIUFFRE advised that some of her photographs that were provided to her civil attorneys by her family were not returned. One of the missing photos depicted GIUFFRE wearing a pink dress while seated on a quad bike.

[redacted] LNU was [redacted] female that formerly lived in [redacted]

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LNU and GIUFFRE went shopping together and purchased clothing and sex toys. GIUFFRE explained that [redacted]

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GIUFFRE used a cellular telephone [redacted] She believed it was a New York City number but could not recall the number. GIUFFRE and [redacted]

GIUFFRE could only remember faces [redacted] not their names. GIUFFRE did not [redacted] but she did try unsuccessfully to get [redacted]

GIUFFRE recalled [redacted] but she could not recall the wording. [redacted] LNU. GIUFFRE advised [redacted]

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GIUFFRE traveled [redacted] to a self-help conference at a hotel in New Orleans, Louisiana. The hotel was near the Hard Rock Café in New Orleans. GIUFFRE traveled the world [redacted] including the USVI, New York, Santa Fe, Palm Beach, France, Africa, Spain and the United Kingdom.

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[redacted] GIUFFRE recalled visiting Alhambra Castle in Spain. [redacted] GIUFFRE eventually traveled to the United Kingdom and

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while there, [redacted] approached GIUFFRE in a very excited manner and told her they had to go shopping to pick out a dress because GIUFFRE would be dancing with [redacted]

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GIUFFRE and [redacted] went shopping and purchased makeup, clothing, and a Burberry bag. The items were purchased with [redacted] GIUFFRE and [redacted] returned [redacted] instructed GIUFFRE to get ready. When GIUFFRE came down after getting ready, she was introduced to [redacted]

[redacted] GIUFFRE traveled to CLUB TRAMP [redacted] GIUFFRE danced [redacted] at CLUB TRAMP [redacted] stayed at CLUB TRAMP for an hour or hour and a half and drank a couple of cocktails before returning to [redacted] GIUFFRE had not received any direction from [redacted] After returning to [redacted] GIUFFRE requested [redacted] to take a photograph of her [redacted] GIUFFRE advised that she still had the original photograph in her possession and would provide it to the interviewing agents. GIUFFRE proceeded with [redacted]

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Approximately two months later, GIUFFRE met [redacted] at [redacted] GIUFFRE recalled [redacted] LNU, [redacted] GIUFFRE recalled [redacted] joking about trading GIUFFRE in because she was getting too old.

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GIUFFRE recalled meeting [redacted] GIUFFRE was using Xanax heavily at the time, and her recollection was not clear. She remembered there were many models on the island that did not speak English along with a modeling person who had an unknown accent.

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[redacted] did not have a problem with GIUFFRE using prescription drugs. [redacted] was described by GIUFFRE as a [redacted]

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[redacted] (TRUE NAME UNKNOWN) [redacted] a ranch employee in [redacted] but GIUFFRE could not recall his name. She did have a photograph of the ranch employee.

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GIUFFRE met numerous famous people [redacted] including academics, politicians, and celebrities. She met [redacted] and [redacted] and [redacted]

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GIUFFRE received many gifts [redacted] including jewelry, watches, bags, shoes, make up, clothing, and home furnishings. [redacted] GIUFFRE left all of the items behind when she traveled to Thailand to receive massage training.

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In August 2002, GIUFFRE traveled by commercial airline to Bangkok, Thailand and began her massage training at International Training Massage School(ITM) where she received her massage certification. She stayed at the Princess Hotel in Thailand [redacted] but never did. GIUFFRE met her future husband, [redacted] during her visit to Thailand. GIUFFRE contacted [redacted] telephonically and told him she had fallen in love with someone. [redacted]

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GIUFFRE had not heard from [redacted] GIUFFRE received a telephone call from [redacted] During that call, [redacted] stated he was an FBI agent. He was trying to determine what she knew about [redacted]. She did not tell [redacted] anything about her knowledge of [redacted] She also received another telephone call from a person that indicated he was an FBI agent. She did not tell that individual anything either. She also received a call from an attorney that was trying to determine if she had spoken with anyone or was willing to speak to anyone [redacted] She explained that she was receiving telephone calls from people whom she did not know and that she was uncomfortable telling them anything over the telephone.

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One or two weeks later, an unknown attorney and [redacted] contacted GIUFFRE telephonically. [redacted]

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GIUFFRE was using a cellular telephone belonging to her husband. She nor her husband could recall the telephone number but advised that the carrier was OPTUS telephone company.

GIUFFRE reviewed a series of photographs of individuals and identified the following:

Page 1, number 1, [redacted]

Page 1, number 2, [redacted] LNU, a.k.a. [redacted]

Page 2, number 1, [redacted]

Page 2, number 6, [redacted]

Page 3, number 2, [redacted]

Page 4, number 3, [redacted] LNU

Page 4, number 7, [redacted]

Page 4, number 8, [redacted]

Page 5, number 1, [redacted]

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GIUFFRE advised that the following were familiar to her, but she could not recall their names or her association to them:

Page 1, number 4

Page 2, numbers 7 and 8

Page 3, number 8

Page 4, number 1

Page 5, numbers 5 and 8

The images reviewed by GIUFFRE were placed in a 1A envelope of the case file.

When questioned about United States Customs and Border (CBP) Patrol records of her entries into the United States, GIUFFRE advised that her January 2001 record was the return from her London, England trip [redacted] The April 2001 CBP record was her return to the United States [redacted] GIUFFRE could not recall her travel from March and May 2001 CPB records. GIUFFRE advised that her United States Passport was turned over to the United States Consulate in Sydney, Australia.

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On March 18, 2011, writer, SA [redacted] and [redacted] traveled to GIUFFRE's residence where she provided 20 photographs and her ITM massage school certification. FD-597 Receipts for Property were executed for the items and a copy was provided to GIUFFRE. It is noted that the receipts were dated based on the United States Eastern Standard Time Zone date. The photographs, certification and original FD-597s were placed in a 1A envelopes of case file.

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EXHIBIT 32
(Filed Under Seal)

MS MAXWELL

VIRGINIA ROBERTS

ALL MS. MAXWELL AT

!!

USE JOJO'S CELL PHONE

TO MAKE

MM

DANNY

G-MA DAISY

FYI: NANTIHDA THARANASOO MAY STILL BE IN THAILAND DURING YOUR STAY. IF SHE IS, SHE WILL BE STAYING AT THE SAME HOTEL.

EXHIBIT 33
(Filed Under Seal)

Qui Tam
Class Action
Personal Injury
Wrongful Death
Commercial Litigation

Farmer, Jaffe, Weissing,
Edwards, Fistos & Lehrman, P.L.

December 30, 2014

New York Presbyterian Hospital
Weill Cornwell Medical Center
Medical Records
525 East 68 Street
New York, NY 10065

RE: Request for MEDICAL RECORDS and BILLING

Our Client/Your Patient	:	Virginia Roberts
Date of Birth	:	
Dates Requested	:	January 1, 1998 – December 31, 2000
Our File Number	:	

To Whom It May Concern:

This is a follow up to our original December 1, 2014 request for medical records (a copy of same is attached for your convenience). Attached, please find a copy of the Refused/Returned Notice for your convenience. Pursuant to same, please be advised that we would like ALL records from August 9, 1983 – present. If that is too general/broad, please limit the search to January 1, 1998 to December 31, 2000.

Please contact us if the reproduction costs exceed $50.00.

Please contact us if you have any questions or wish to discuss this matter further. We look forward to your prompt compliance with this request.

Very truly yours,
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.

Amy W. Dishowitz, Paralegal
For Bradley J. Edwards, Esq.
BJE: awd
Enclosures

RECEIVED
JAN 06 2015
BY: ....

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
954.524.2820 office 954.524.2822 fax

Qui Tam
Class Action
Personal Injury
Wrongful Death
Commercial Litigation

Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.

December 30, 2014

New York Presbyterian Hospital
Weill Cornwell Medical Center
Medical Records
525 East 68 Street
New York, NY 10065

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Very truly yours,
FARMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.

[signature]

Amy W. Dishowitz, Paralegal
For Bradley J. Edwards, Esq.
BJE: awd
Enclosures

RECEIVED
JAN 0 6 2015
BY: ....

425 North Andrews Avenue, Suite 2, Fort Lauderdale, Florida 33301
954.524.2820 office 954.524.2822 fax

DocType: EMERGENCY DEPT RECORD

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

E

49125

ROBERTS, VIRGINIA L.

NURSING DOCUMENTATION SHEET
EMERGENCY DEPARTMENT TRIAGE ASSESSMENT/DOCUMENTATION RECORD

Date: 4/9/01 Time: 325 pm Name: Roberts, Virginia Birth D... Age: 18

Immunizations: ☐ Current ☐ No (Physician notified)
Tetanus: ☐ < 5 yrs ☐ > 5 yrs

☐ Emergent ☒ Urgent ☐ Non-Urgent | ☒ Med ☒ Surg ☐ Peds ☐ Psych | ☒ Main ED ☐ UCC ☐ Peds ☐ Psych

Medication Hx: ☐ None ☐ Over the counter ☐ Unknown
BCP

PMH: ☒ None ☐ Cardiac ☐ MI ☐ CVA ☐ Diabetes ☐ ESRD ☐ Respiratory ☐ Seizures ☐ Unknown
Other:

Allergies: ☐ Unknown ☐ None
Wilson

Chief Complaint:

Brief Assessment/Hx of presenting Complaint: c/o irregular vag bleeding x 3wks c dizziness, nausea, vomiting, "sharp" low abd pain

Triage Interventions: ☐ Ice ☐ Elevation ☐ Immobilization ☐ Dressing ☐ Respiratory Precautions ☐ C-Collar ☐ Security Watch

Time	Temp	Pulse	Resp	BP		Triage Status/Upgrade/comments
325	97.8	100	18	103/65		

Observation/Reassessment

Mental Status	Skin Color	Respirations	Skin Temp	Speech	ABD/Urinary ☐ NA
☒ Alert ☒ Oriented ☐ Lethargic ☐ Confused ☐ Cooperative ☐ Combative ☐ Hallucinations ☐ Suicidal ☐ Unresponsive	☐ Normal ☐ Cyanotic ☒ Pale ☐ Flushed ☐ Icteric ☐ Rash ☐ Vesicles ☐ Hives	☒ Normal ☐ Shallow ☐ Labored ☐ Dyspneic ☐ Irregular	☒ Warm & Dry ☐ Hot & Dry ☐ Hot & Moist ☐ Cool & Moist	☒ Coherent ☐ Incoherent ☐ Slurred ☐ Aphasic ☐ Mute	☐ Pain Location: low abd pain ☐ Last BM ☒ Nausea ☒ Vomiting ☐ Diarrhea
		Pulse Ox ☐ NA	Pain Scale ☒ NA /10	GCS ☒ NA	Urinary Complaints ☐ Burning ☐ Urgency ☐ Retention ☐ Frequency ☐ Hematuria

Gyn ☐ NA Grava: Para:
LMP: ~ 1 mo ago ☐ Normal
Pregnant ☐ Yes ☐ No ☐ Unsure
☒ Pain Location
☒ Bleeding ☒ Clots ☐ Cramping
☐ Vaginal Discharge ☐ Odor
Color

Nurses Signature: [signature] Initials

Time In: 645 pm Room #: E - South

Time	
	upt (-), pt. c/o lower pelvic pain, c discharge. Abdomen soft, non-distended skin W+D

Time	Medication	Dose	Route	Site	Medication	Dose	INT

Initials	Signature	Initials	Signature

49129 (7/09)

CHART COPY

DocType: EMERGENCY DEPT RECORD

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

49125

EMERGENCY DEPARTMENT
PHYSICIAN'S RECORD & DISCHARGE INSTRUCTIONS

ROBERTS, VIRGINIA L.

PERSONAL

NAME | AGE 18 | DATE OF BIRTH | PHYSICIAN

STREET ADDRESS | APT | CITY Royal Palm | STATE FL | ZIP CODE 334

HOME PHONE NO. | CONTACT AND PHONE #

EMPLOYER

PRIMARY INSURANCE | SECONDARY INSURANCE

RELIGION | DATE AND TIME OF VISIT

DATE 7/9/01 | TIME | PHYSICIANS NAME (PRINTED) | DATE AND TIME ALL ENTRIES, AND WRITE SIGNATURE AND MD CODE AFTER EACH ENTRY

HISTORY AND PHYSICAL EXAM

Pt is 18yo ♀ CC: Low ABD Pain
Pt reports low abd pain. Denies N&V x 3 weeks
pt reports that she is sexually active c̄
one partner for the past 2 years.
PMH: Ø Meds: OCP All: Ø

PE: 37.8 / 102 / 18 / 105/85
RRR, CTA B
ABD: Soft ND BS - Tender in R & L LQ
Pelvic: white watery discharge
Cervix: Pink & closed
⊕ CMT
Rectal: Heme ⊖

Upt ⊖ 7/10/01 CT A/P w/contr. F.L.

Right column notes:
Att: hx, exam above.
Pt stable / afebrile / was able to keep down juice in ED / Abd with bilat. LQ pain R & L & CMT
probable PID / upt ⊖
WBC nl / Gyn to evaluate re: Rx in inpatient vs. outpatient. Since pt is daily taking po & reliable would probably start Rx in ED + send home on po.
Gyn eval. ⓟ
AB02

TESTS AND PROCEDURES
Labs
UA: ... / WBC 0-2 / ... / 1.025 / LE ⊖
Culture: Sert, GC, Chlamydia

$8.2 \; \frac{12.2}{38.2} \; 272$

136 | 103 | 6 ; 3.6 | 21 | 0.8 ; 115

DIAGNOSIS:

CONDITION: ☒ STABLE ☐ UNSTABLE | ICD-9 CODE

DISPOSITION: ☐ ADMIT TO: ☐ TRANSFER TO:
☒ DISCHARGE — PATIENT TO FOLLOW UP AT/WITH: OB/GYN on Friday 9AM

PATIENT INSTRUCTIONS
Cefixime 400 mg ī tablet by mouth

☐ CALL 746-0792 FOR RESULTS OF THE FOLLOWING TESTS:

RETURN TO EMERGENCY DEPARTMENT FOR PERSISTENT, WORSENING, OR NEW SYMPTOMS, INCLUDING: Increased pain, vomiting, ... fever

CAREFULLY READ THE PROVIDED INSTRUCTIONS REGARDING: ☐ WOUND CARE ☐ HEAD INJURY ☐ SPRAINS AND BRUISES ☐ TETANUS IMMUNIZATION ☐ CASTS, SPLINTS, ELASTIC BANDAGES ☐ X-RAYS

RESIDENT'S SIGNATURE: [signature] | MD CODE: ... | ATTENDING PHYSICIAN'S SIGNATURE: [signature] | MD CODE: AB02

☒ PATIENT VERBALIZES UNDERSTANDING OF THE ABOVE DISCHARGE INSTRUCTIONS

PATIENT'S SIGNATURE: Virginia Roberts | NURSE'S SIGNATURE: [signature] | TIME OUT: ...

49126 (2/99)

CHART COPY

DocType: EMERGENCY DEPT RECORD

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

49125

EMERGENCY NOTES, Continuation
EMERGENCY DEPARTMENT

Roberts, Virginia
IF NO PLATE, PRINT NAME, SEX AND HISTORY NO.

7/9/01 10pm GYN

18 y.o. G₀P₀₀₀₀ LMP 6/9/01 presents abd pain, N/V, HA since last night intermittently for 3 wks, brown vaginal discharge x 3 wks. (3 pads/day) 1 episode of fainting 2 days ago where she fell and hit her head. Pt has b/l lower abd pain, sharp, intermittent. ⊕ back pain B/L. ∅ dysuria ∅ urgency ⊕ dyspareunia (w/ deep penetration) ∅ bright red blood per vagina. Last BM 2 days ago ∅ BRBPR ∅ mucous ↓ PO intake x 2 days, lost 7 lbs this month, ↓↓ appetite. partner has no symptoms.

GYN - M x irregular x 5 days - 2 wks, severe menstrual cramps. on OCP x 9 mos but period still irregular
H/o ovarian cysts? ∅ endometriosis ∅ fibroids
∅ STD's, sexually active same partner x 2 yrs.
Carolyn Steinberg to PMD [redacted]

PMH - ∅ meds - OCP's
PSH - ∅ allergies - NKDA
Soc Hx - ∅ EtOH ∅ tobacco ∅ drugs
Fam Hx - Breast CA mother, aunt
VS - T 37.8 BP 103/85 P 102 R 18
Chest - CTA B/L
Cor - RRR + S1S2
Abd - soft, BS⊕, mod tenderness RLQ + LLQ, generalized tenderness to palpation ∅ rebound ∅ guarding
Ext - ∅ c/c/e Back - ∅ CVA tenderness
Pelvic - SSE - white discharge in vag vault, os closed, ∅ VB; SVE - ⊕CMT, b/l adnexal tenderness, uterus not palpable 2° to discomfort

Labs - 13.2 / 8.2 / 38.2 / 272; 138 | 103 | 8 / 3.6 | 21 | 0.8 / 115; U/A 0-2 RBC, 0-2 WBC, dk yellow, nitrite ⊖, leuk est ⊖

Sono - EMS 7.3 mm, ovaries appear normal, Ⓛ ovary 4.5 x 9.0 cm Ⓡ ovary 4.5 x 1.7 cm, trace free fluid in cul de sac
GC/chlam cx's sent, UPT ⊖, T+S A⊕
Slide - epith cells, ∅ clue cells, ∅ trichomonas

A/P - 18 y.o. F c abd pain, N/V, diarrhea ⊕ CMT on exam.
Possible ruptured ovarian cyst vs. R/o appendicitis vs. Gastroenteritis
D/w GYN - Dont PID as pt is afebrile and nl WBC's. Recommend getting CT scan or official sonogram in AM.
F/u in GYN clinic - Dr. 7/13/01 @ 9:00 am. F/u cultures.
Return if symptoms worsen, fever, severe abd pain.
Pending results of CT scan, may give Ceftriaxone 250mg IM x 1 and Azithromycin 1 gm PO x 1

MD 133

49125 (2/99) SR 146

MEDICAL RECORD

ed by DIN9011

01-05-2015 21:18:54

GIUFFRE003262

DocType: EMERGENCY DEPT RECORD

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

49125
EMERGENCY NOTES, Continuation
EMERGENCY DEPARTMENT

Roberts, Virginia
IF NO PLATE, PRINT NAME, SEX AND HISTORY NO.

Gyn PGY-2 addendum

Pt seen + examined by me.
18 y/o G1 P0010 LMP 6/9/01 c̄ 3 wks ↑ generalized periumbilical + pelvic pain, worsening over this time, ⊕ nausea ⊖ emesis x1 day, ⊕ diarrhea. Ø urinary Sx, monog. relationship x 2 yrs, Ø h/o STDs/PID
Pt afebrile in ED, VSS
Abd soft, ⊕BS, ⊕ RLQ + LLQ TTP, Ø R/G, Ø masses
SSE: os closed ⊕ white d/c, Ø blood
VE: generalized discomfort c̄ exam, B/L LQ tenderness, B/L adnexal tenderness, discomfort on palpation ↑ uterus, ?mild CMT.
ED Sono: uterus c̄ thin EMS 2-3mm
L ov 4 cm x 1.5 cm c̄ mult follicles
R ov 4.2 cm x 1.7 cm c̄ mult follicles
trace FF in CDS, Ø masses seen
Ø dyscomfort during sonogram.
Wet prep: Ø clue cells, rare (WBC's
6.2) 37.2 UPT ⊖

A/P: 18 y/o ♀ c̄ abd pain, ⊕N/V/D, afebrile + NL WBC. Doubt PID given afebrile, NL WBC, ⊖ wet prep. Possible etiologies include ruptured ov cyst given trace FF, would also r/o appendicitis, consider other GI pathology given GI Sx's.
Doubt acute Gyn pathology at this time.
~~Will treat prophylactically with~~ Pelvic discomfort ~~and CMT~~ on pelvic exam likely 2° peritoneal irritation.
Will treat prophylactically c̄ Ceftriaxone 250 mg IM x1 and Zithro 1g PO x1
Would recommend CT Abd/Pelvis
– above discussed c̄ Dr Palermo and Dr. Charles-Rawlins
– Pt to f/u in Gyn clinic on 7/13/01
– Return if fever, worsening Sx.

S. Portnoy [signature] PGY2

49125 (2/99) MEDICAL RECORD RR 146

DocType: EMERGENCY DEPT RECORD

Standard Register

NewYork-Presbyterian Hospital
New York Weill Cornell Medical Center

49125

EMERGENCY NURSING FLOW SHEET
EMERGENCY DEPARTMENT

Roberts Virginia

DATE 7/09/01 LOCATION quick Hy 11 WEIGHT

IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO.

ALLERGIES	NURSE	INITIALS	ALLERGIES	NURSE	INITIALS
NKDA	[illegible]	[illegible]	NKDA	[illegible]	[illegible]
	[illegible]	[illegible]			

TIME	BP	T	P	R	
2045	102/66	37	88	18	pt A&O x3, respirations even & unlabored. pt states pain has decreased but she is still experiencing headache. pt refused ... at this time. [illegible] resident notified and spoke to pt. ... Motrin 800 po as ordered
1130	116/68		84	18	pt [illegible] drinking gastrografin. To go for CT scan [illegible]
330					Continuing to drink gastrografin
340	103/70	36.9	84	18	Awaiting to go to CT scan. [illegible]
4					To CT scan via wheelchair
5					Back from CT scan. Awaits dispo. [illegible]
8	103/70		95	16	pt awake A&O x3 [illegible] pt awaits [illegible] [illegible]
815					Rec'd report, pt awake A&Ox3, awaits dispo, pt refuses antibiotics @ this time and report will wait until cultures come back. Dr Kaplan made aware, gyn notified, and will come to speak to pt.
10	150/80	36.8	80	16	NAD pt D/C'd to written + verbal instruction + medication [illegible]

TIME	MEDICATIONS	RN	TIME	MEDICATIONS	RN
2045	Motrin 800mg PO	[illegible]			
125	Gastrografin	[illegible]			
830	Azithromycin 1g PO	[illegible]			

INITIAL STUDIES/X-RAYS

- ☐ CBC ☐ T&C
- ☐ Lytes ☐ Cord. Enz.
- ☐ BUN/Cr ☐ Bld Cult
- ☐ Pt, PTT ☐ ABG
- ☐ Profile ☐ EKG
- ☐ Amylase ☐ Urine HCG
- ☐ U/A ☐ C&S
- ☐ X-Ray and Other

DocType: EMERGENCY DEPT RECORD

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

49125

EMERGENCY NOTES, Continuation
EMERGENCY DEPARTMENT

Roberts, Virginia

IF NO PLATE, PRINT NAME, SEX AND HISTORY NO.

7/11/01
Pt called for GC/chlamidia and urine culture results - reported to pt. as negative. R. Bang? ANP

49125 (2/95) SR 146

MEDICAL RECORD

DocType: PROGRESS NOTES

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

45104

Virginia Roberts

PROGRESS NOTES

IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO

DATE (MO., DT., YR.)	LOCATION	SERVICE	AGE	DOCTOR

7.10.01 Internal Med

18yo f c̄ N/V / abdominal pain / vag bleeding. Saw pt in office 7.9 pm. 3 weeks of vaginal spotting, 2 days fever to 102.3, N/V x 12 hours. AF in office, BP 90/palp c̄ pulse 120-130. ⊕ CMT on exam. Sent to ER for IV hydration & GYN w/u.

Pt refused IVF in ER. GYN w/u per note indicated ⊖ pelvic u/s. CT also done - reported "normal." Pt has no localizing S/S on exam x̄ CMT. Likely has cervicitis s̄ e/o PID on studies.

Agree c̄ prophylactic Rx for chlamydia & G/C while cultures are ⊕. Can f/u c̄ me in my office 7/11 or 7/12.

[signature] MD
STTFO
X64015

45104 (8/97)

ed by DIN9011 | Page 1 | 01-06-2015 21:17:03

CONFIDENTIAL

GIUFFRE003266

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.
Req#:

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date:	07/09/2001	Recvd Date:	07/09/2001	Rpt Date:	07/10/2001
Coll Time:	1911	Recvd Time:	1911	Rpt Time:	0438

FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
COMPLETE BLOOD COUNT				
WBC		8.2	3.4-11.2	K/uL
RBC		4.23	3.80-5.20	M/uL
HGB		13.2	11.7-16.0	g/dL
HCT		38.2	35.0-47.0	%
MCV		90.3	81.0-100.0	fL
MCH		31.2	27.0-34.0	pg
MCHC		34.6	32.0-36.0	g/dL
RDW		12.6	11.0-14.0	%
PLATELET		272.0	150.0-450.0	K/uL
MPV		10.4	6.0-12.0	fL
AUTOMATED DIFFERENTIAL				
NEUT %	83.4 H		45.0-75.0	%
LYMPH %	8.1 L		20.0-50.0	%
MONO %		7.6	2.0-11.0	%
EOS %		0.5	0.0-5.0	%
BASO %		0.4	0.0-1.0	%
NEUT ABS	6.8 H		2.1-4.9	K/uL
LYMPH ABS	0.7 L		1.4-2.9	K/uL
MONO ABS		0.6	0.2-0.9	K/uL
EOS ABS		0.0	0.0-0.3	K/uL
BASO ABS		0.0	0.0-0.1	K/uL

DocType: LAB REPORTS

L=LOW, H=HIGH

Page: 1
CONTINUED

OUTPATIENT REPORT

DocType: LAB REPORTS

M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/09/2001 Rpt Date: 07/10/2001
Coll Time: 1911 Recvd Time: 1911 Rpt Time: 0438
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
ROUTINE CHEMISTRY				
AMYLASE		46	15-127	U/L

Page: 2
CONTINUED

OUTPATIENT REPORT

DocType: LAB REPORTS

Patient Name: ROBERTS, VIRGINIA L.

Med Rec #:
Date of Birth: Sex: F
100210000
Req#|||

CLIENT INFORMATION:

EMOND, STEPHEN D MD
525 East 68th Street
New York NY

Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/09/2001 Rpt Date: 07/10/2001
Coll Time: 1911 Recvd Time: 1911 Rpt Time: 0438
FINAL

CANCELLED TESTS

PROCEDURE	DRAWN DATE	REASON
BASIC METABOL PANEL Order Entry Error	07/09/01	

Page: 3
END OF CHART

[redacted] DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.
Med Rec #: [redacted]
Req#:

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/09/2001 Rpt Date: 07/10/2001
Coll Time: 1855 Recvd Time: 1913 Rpt Time: 0438
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
MACROSCOPIC URINALYSIS				
COLOR		DK YELLO	YELLOW	
APPEARANCE		CLEAR	CLEAR	
PROTEIN	30*		NEGATIVE	
BLOOD		NEGATIVE	NEGATIVE	
GLUCOSE		NEGATIVE	NEGATIVE	
KETONES	TRACE*		NEGATIVE	
pH		7.0	4.6-8.0	
BILIRUBIN		NEGATIVE	NEGATIVE	
SP GRAVITY		1.025	1.005-1.030	
NITRATE		NEGATIVE	NEGATIVE	
LEUKOCYTE ESTER		NEGATIVE	NEGATIVE	
MICROSCOPIC URINALYSIS				
NOTE		SEE NOTE#		
RBC/HPF		0-2	0-2	
WBC/HPF		0-2	0-2	
RENAL EPITH		NEGATIVE	NEGATIVE	

NOTE (09/06/2000 -- Current)

THIS URINE HAS BEEN EXAMINED FOR WBC, RBC, CASTS, CRYSTALS AND EPITHELIAL CELLS. ANY OF THESE ELEMENTS NOT REPORTED WAS NOT FOUND.

DocType: LAB REPORTS

*=ABNORMAL, f=FOOTNOTE

Page: 1
END OF CHART

[REDACTED] DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/09/2001 Rpt Date: 07/10/2001
Coll Time: 1915 Recvd Time: 1925 Rpt Time: 0438
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
ROUTINE CHEMISTRY				
GLUCOSE	115 H		70-105	mg/dL
UREA NITROGEN		8	5-25	mg/dL
CREATININE		0.8	0.5-1.5	mg/dL
SODIUM		138	133-147	mmol/L
POTASSIUM		3.6	3.2-5.2	mmol/L
CHLORIDE		103	94-110	mmol/L
CO2	21 L		22-32	mmol/L
ANION GAP		14	05-17	
URIC ACID		3.2	2.5-7.5	mg/dL
CALCIUM		9.0	8.5-10.5	mg/dL
PHOSPHORUS		3.4	2.2-4.2	mg/dL
PROTEIN, TOTAL		7.7	5.5-8.0	g/dL
ALBUMIN		4.3	3.0-5.0	g/dL
GLOBULIN	3.4 H		1.8-3.3	g/dL
BILIRUBIN TOT		0.7	0.2-1.3	mg/dL
BILIRUBIN DIR		0.2	0.1-0.4	mg/dL
BILIRUBIN IND		0.5	0.1-0.8	mg/dL
CHOLESTEROL		130 f	≤ 200	mg/dL
MAGNESIUM		1.6	1.5-1.9	mEq/L
AST		20	0-45	U/L
ALT		13	0-45	U/L

CHOLESTEROL (03/17/1999 -- Current)

[REDACTED] DocType: LAB REPORTS

DESIRABLE:	<200 mg/dL
BORDERLINE HIGH:	200-239 mg/dL
HIGH:	>=240 mg/dL

L=LOW, H=HIGH, f=FOOTNOTE

Page: 1
CONTINUED

OUTPATIENT REPORT

DocType: LAB REPORTS

M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/09/2001 Rpt Date: 07/10/2001
Coll Time: 1915 Recvd Time: 1925 Rpt Time: 0438
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
ROUTINE CHEMISTRY				
LD		183	80-225	U/L
ALKALINE PHOS		76	30-110	U/L
CORONARY RISK				
CHOLESTEROL		130	< 200	mg/dL

DESIRABLE: <200 mg/dL

BORDERLINE HIGH: 200-239 mg/dL

HIGH: >=240 mg/dL

DocType: LAB REPORTS

Page: 2
END OF CHART

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

Req#:

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/09/2001 Rpt Date: 07/10/2001
Coll Time: 1934 Recvd Time: 1934 Rpt Time: 0438
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS

SENDOUT CULTURES

BLOOD GROUP AND TYPE

PROCEDURE: ABO RH

07/09/2001 1934 A POS

ANTIBODY SCREEN AND WORKUP

PROCEDURE: ABSC INT

07/09/2001 1934 NOTIMMZD

DocType: LAB REPORTS

Page: 1
END OF CHART

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/11/2001
Coll Time: 0941 Recvd Time: 0941 Rpt Time: 0452
FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS
		GC-CHLAMYDIA		
CHLAMYDIA-GC BY AMPLIFICATION				
CHLA SWAB SOURC		CERVIX		
CHLA SWAB		NEGATIVE	NEGATIVE	
GC SWAB SOURCE		CERVIX		
GC SWAB		NEGATIVE	NEGATIVE	

Page: 1
END OF CHART

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

F

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/11/2001
Coll Time: 1929 Recvd Time: 0941 Rpt Time: 0452

PARTIAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS

GENITAL:CULTURE-SCREEN

GENITAL CULTURE
SOURCE:CERVIX
FREETEXT SOURCE:

COLLECTED: 07/09/01 1929
RECEIVED: 07/10/01 0941
STARTED: 07/10/01 0941

ACCESSION# 01-ME-01-045532

--- STAINS & PREPS ---

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WBC SEEN

Page: 1
END OF CHART

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

Req#: 0

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001
Coll Time: 1929

Recvd Date: 07/10/2001
Recvd Time: 0941
PARTIAL

Rpt Date: 07/12/2001
Rpt Time: 0532

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS

GENITAL:CULTURE-SCREEN

GENITAL CULTURE
SOURCE:CERVIX
FREETEXT SOURCE:

COLLECTED: 07/09/01 1929
RECEIVED: 07/10/01 0941
STARTED: 07/10/01 0941

ACCESSION#: 01-MB-01-045532

--- STAINS & PREPS ---

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WBC SEEN

--- PRELIMINARY REPORT ---

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

DocType: LAB REPORTS

Page: 1
END OF CHART

[REDACTED] DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

[REDACTED]

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date:	07/09/2001	Recvd Date:	07/10/2001	Rpt Date:	07/12/2001
Coll Time:	1655	Recvd Time:	1102	Rpt Time:	0532

FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS

URINE CULTURE

URINE CULTURE
SOURCE:URINE CLEAN CATCH
FREETEXT SOURCE:

COLLECTED: 07/09/01 1855
RECEIVED: 07/10/01 1102
STARTED: 07/10/01 1102

ACCESSION#: 01-MB-01-045573

FINAL REPORT

07/11/2001 1323

NO GROWTH (<1,000 CFU/ML)

Page: 1
END OF CHART

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date: 07/09/2001 Recvd Date: 07/10/2001 Rpt Date: 07/13/2001
Coll Time: 1929 Recvd Time: 0941 Rpt Time: 0541
PARTIAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS

GENITAL:CULTURE-SCREEN

GENITAL CULTURE
SOURCE:CERVIX
FREETEXT SOURCE:

COLLECTED: 07/09/01 1929
RECEIVED: 07/10/01 0941
STARTED: 07/10/01 0941

ACCESSION#: 01-MB-01-045532

--- STAINS & PREPS ---

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WBC SEEN

--- PRELIMINARY REPORT ---

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

07/12/2001 1130

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

DocType: LAB REPORTS

Page: 1
END OF CHART

DocType: LAB REPORTS

525 East 68th Street, New York, N.Y.10021
M. Desmond Burke, M.D., Laboratory Director

Patient Name: ROBERTS, VIRGINIA L.
Med Rec #:

CLIENT INFORMATION:
EMOND, STEPHEN D MD
525 East 68th Street
New York NY 100210000
Client#: 00000
NEW YORK HOSPITAL

Coll Date:	07/09/2001	Recvd Date:	07/10/2001	Rpt Date:	07/14/2001
Coll Time:	1929	Recvd Time:	0941	Rpt Time:	0431

FINAL

TEST NAME	ABNORMAL	NORMAL	REFERENCE	UNITS

GENITAL:CULTURE-SCREEN

GENITAL CULTURE
SOURCE:CERVIX
FREETEXT SOURCE:

COLLECTED: 07/09/01 1929
RECEIVED: 07/10/01 0941
STARTED: 07/10/01 0941

ACCESSION# 01-MB-01-045532

--- STAINS & PREPS ---

07/10/2001 1342

MANY GRAM POSITIVE BACILLI CONSISTENT WITH LACTOBACILLI

MODERATE EPITHELIAL CELLS

MODERATE WBC SEEN

--- PRELIMINARY REPORT ---

07/11/2001 1037

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

07/12/2001 1130

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

LACTOBACILLI

CULTURE BEING HELD FOR FURTHER EVALUATION

--- FINAL REPORT ---

07/13/2001 1117

MODERATE GRAM POSITIVE BACILLI CONSISTENT WITH

DocType: LAB REPORTS

LACTOBACILLI

NO NEISSERIA GONORRHEAE ISOLATED

Page: 1
END OF CHART

DocType: ORDERS

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

45171

ROBERTS, VIRGINIA L.

DIAGNOSTIC PROCEDURE ORDER FORM

(1) MD/NP: Indicate test(s) to be performed by checking appropriate box or completing the section "Other Procedure Not Listed". Indicate priority rating for each and complete Clinical Data Section Sign order form.
(2) Unit Clerk: Fax this form to appropriate test area(s) and complete the following: Date Faxed ______ Time ______ Clerk Initials ______
(3) Test Area: Call the Clerk and provide date(s) and time(s) test(s) will be done.
Unit Clerk: Write the Date and Time, as provided by test area, onto this form.
(4) Unit Clerk: Follow current procedure for posting order on unit and place form in medical record.
(5) RN: Verify order and sign on designated line.
(6) Portable Radiology: Do not fax form. Phone area to request exam. Give yellow copy to Tech.

P Indicates Prep. is required. C Indicates WRITTEN CONSENT is Required

Time Blocks: A=8A-12N B=12N-4P C=4P-8A

UNIT ______ ROOM # ______

PRIORITY RATING: 1 = EMERGENCY (NOW) 2 = URGENT (TODAY) 3 = ROUTINE

CARDIOLOGY	PRIORITY 1, 2 or 3	FAX	TO BE DONE DATE	TIME
☐ Echo ☐ PORT		68701		
☐ EKG ☐ PORT ☐ Signal Average EKG		68701		
☐ Holter Monitor		68701		
☐ E.T.T.		68701		
PULMONARY				
☐ PFTs		68808		
NEUROLOGY				
☐ DOPPLER: ☐ CAROTID		68984		
☐ TRANSCRANIAL		68984		
NUCLEAR MEDICINE				
☐ Bone Scan P		68873		
☐ Gallium P		68873		
☐ Biliary P		68873		
☐ DPX P		68873		
☐ Renal P		68873		
☐ VQ P		68873		
☐ RNCA		68873		
☐ Thallium		68873		
☐ Thyroid				

RADIOLOGY	PRIORITY 1, 2 or 3	FAX	TO BE DONE DATE	TIME
☐ Abdomen ☐ Flat ☐ Erect		28093		
☐ CXR		28093		
☐ Ftl ☐ Rght ☐ Lft / ☐ Hnd ☐ Rght ☐ Lft / ☐ Akle ☐ Rght ☐ Lft		28093		
☐ Pelvis		28093		
☐ Ribs		28093		
☐ Spine ☐ ___ (level) ☐ Mammogram		28093		
☐ Portable		28093		
FLUOROSCOPY				
☐ Ba E P		28093		
☐ IVP C,P		28093		
☐ Small Bowel Series P		28093		
☐ UGI Series P		28093		
SONOGRAPHY				
☐ Abdomen P		60137		
☐ OB/GYN P		60137		
☐ Pelvis P		60137		
☐ Scrotum P		60137		
☐ Thyroid P		60137		
☐ Renal P		60137		
☐ Head P		60137		
☐ Other ___ (Specify) P		60137		
CAT SCAN* C,P				
☐ Head		68060		
☐ Cervical Spine		68060		
☐ Thoracic Spine		68060		
☐ Lumbar Spine		68060		
☐ Chest		68044		
☒ Abdomen		68044		
☒ Pelvis		68044		
*☐ With Contrast - P Patient to be NPO 4 hrs. Requires BUN & Creat.				
MRI				
☐ Extremity		68046		
☐ Head		68046		
☐ Spine		68046		
☐ With GAD		68046		

E to / U Contrast

OTHER PROCEDURES NOT LISTED:
☐ ______
☐ r/o APPY
☐ ______

CLINICAL DATA
☐ Consent Obtained
☐ Respiratory Precautions
☐ Wound/Skin Precautions
☐ Pregnancy

☐ Pediatric Patient: - for Pediatric Radiology (M-F 8am - 4pm) fax to 60138
for Pediatric Cardiology fax to 68373
☐ Pre-Op Date of Surgery ______
Clinical History ______
For Contrast Studies: BUN ______ Creat. ______

Ordering Physician/NP RIGSTONE ID Code RS071 Beeper # 11171
Date 7/10/01 Time 1230 Am Attending MD ______

RN Signature ______ RN

CHART COPY

44320 (2/89)

ed by DIN9011 Page 1 01-05-2015 21:17:22

DocType: ORDERS

PROCEDURE ORDER FORM

Many of the Radiology examinations require that the patient be prepared for the procedure that is being ordered. We have included a brief description of the most common procedures, HOWEVER, all exams are included in the **Manual of Laboratory, X-Ray, and Special Procedures** and are contained in the Ancillary Services section in this manual. The procedure in the manual contains a brief description, indications, contraindications, patient preps and special instructions.

Please call Pediatric Radiology x62554 for modified preps for pediatric cases.

NOTE: SEQUENCING of exams is critical when ordering multiple exams. Barium studies generally should be done after other diagnostic procedures. See Manual for more complete information or discuss with Radiologist so as not to delay patient care.

G.I. Series

Prep: N.P.O. from Midnight day before study. Suspend all medication except essential. Antispasmodics should be discontinued 24 hours before procedure.
Aftercare: mild laxative and fluids.

Barium Enema

Prep: Clear fluids 24 hours prior to study,
60 ml magnesium citrate by mouth at 5 PM day before study.
4 bisacodyl tablets (dulcolax) by mouth at 10 PM the night before exam.
1 bisacodyl suppository morning of exam.
Nothing by mouth after midnight.

I.V.P. (Intravenous Pyelogram)

Prep: 10 ounces of magnesium citrate at 6 PM evening before exam.
Nothing by mouth after midnight.

C.T. (Head & Body)

Prep: Clear fluids 4 hours prior to study. Contrast injection requires the patient be NPO for at least 4 hours prior to study. Patients must be cooperative and able to hold their breath for Body CT's.
Aftercare: Patients receiving contrast should be hydrated.

MRI

CONTRAINDICATIONS: ① Patients over 300 lbs. ② Patients with PACEMAKERS CANNOT BE DONE. ③ Patients with metal surgical clips and other prosthetic devices should consult with the Radiologist before ordering MRI's. ④ Claustrophobia and inability to remain still are also contraindication and sedation may be required. SEE MANUAL FOR COMPLETE DETAILS.

Sonograms

PELVIC/OBSTETRICAL: Requires full bladder. Patient should drink water and maintain a full bladder.
ABDOMINAL/AORTIC RENAL: Clear liquid diet for 24 hours prior to exam.

Nuclear Medicine - SPECIAL CONSIDERATIONS:

1. To obtain an adequate study, patient must be able to lie quietly for up to one hour in supine position. Adequate sedation is absolutely necessary in the restless patient.
2. For biliary, meckel's, cardiac, and any studies requiring sedation, the patient must be fasting for a minimum of four hours prior to test.
3. Radioactive iodine is used for thyroid uptake and scanning. Do not schedule test if any of the following drugs or foods have been ingested within minimal time limits indicated:
   Iodine Compound (Lugol's Potassium Iodide, Kelp): 1-2 weeks
   Seafood, Ovaltine, vitamin pills, Orande, Combid: 3-5 days
   Diodrast, Hypaque (i.e., IVP's and arteriograms): 1-2 weeks
   Priodax. Telepaque, etc. (i.e. gallbladder series): 3-6 months
   Lipiodal (i.e., bronchograms): at least 6 months
   Anti-thyroid drugs (i.e., Propylthiouracil, Tapazole): 7 days. If in preparation for urgent radioiodine treatment, consultation is advised.
   Thyroid substance (i.e., desiccated thyroid, Thyroxine): 4 weeks
   Tri-iodothyronine (Cytomel): 10-12 days.
   If special circumstances require evaluation despite the above indications (contraindications) Nuclear Medicine physician consultation advised.

DocType: ORDERS

NEWYORK-PRESBYTERIAN HOSPITAL
New York Weill Cornell Medical Center

45171

PHYSICIAN'S ORDERS
EMERGENCY DEPARTMENT

ROBERTS, VIRGINIA L.

IF NO PLATE, PRINT NAME, SEX AND MEDICAL RECORD NO.

Date: 7/9/01	Time: 19:00	Diagnosis:	
Allergies:			
Vital Signs:	☐ Routine	☐ q 1 hour	☐ q 15 minutes
Activity:	☐ Routine	☐ Bedrest	
Diet:	☐ Regular	☐ NPO	☐ Other:
IV:	☐ Heplock	☐ Fluids:	
Oxygen:	☐ Nasal Cannula ___ L/min	☐ Face Mask ___ %	
Precautions:	☐ Airborne	☐ Droplet	☐ Wound/Skin
Other:	☐ Cardiac Monitor	☐ ECG	☐ Foley Catheter
Labs (circle):	(CBC/diff/plts)	Retic. Ct.	PT/PTT
(Lytes/BUN/C)	Glucose	Ca Mg	Amylase
(Admission Profile)	LFTs	Cardiac Enzymes	ESR
ETOH level	Aspirin level	Acetaminophen level	Tox. Screen
(UA)	Urine C & S	(Urine HCG) neg	Serum HCG
(Type & Screen)	Type & Cross ___ Units	Other:	

Medications, etc.:

☐ Tetanus & Diphtheria Toxoids 0.5 cc. IM

PHYSICIAN'S SIGNATURE	MD CODE	PICKED UP BY NURSE	DATE	TIME
Hu Hurd	MD H4051	[signature]		

DATE 7/9 TIME

LR - 1 L with open then 125cc/hr ☑

Motrin 800mg po x1 ✓

~~Toradol 30mg IV x1~~

~~Toradol 60 IM x1~~

PHYSICIAN'S SIGNATURE	MD CODE	PICKED UP BY NURSE	DATE	TIME
Ben Hufford	MD H4051	[signature]	7/09	2040

DATE 7/10/01 TIME 12:40pm

15 cc gastrografin in 1 L H_2O ☑

PHYSICIAN'S SIGNATURE	MD CODE	PICKED UP BY NURSE	DATE	TIME
[signature]	MD R5[illegible]	[signature]	7/10	12

DATE 7/10/01 TIME 1:25AM

Ceftriaxone 250mg IM x1 ☐ refused

Azithromycin 1gram PO x1 ☑ given [illegible]

PHYSICIAN'S SIGNATURE	MD CODE	PICKED UP BY NURSE	DATE	TIME
[signature]	MD [illegible]	[signature]	7/10/01	[illegible]

50365 (6/99) ✓ = Done in Emergency Department

Printed by DIN9011 Page 3 01-06-2015 21:17:22

EXHIBIT 34
(Filed Under Seal)

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Thur 2/17/2011 9:44:51 PM
Importance: Normal
Subject: RE:
Received: Thur 2/17/2011 9:44:51 PM

Not a problem but we have to continue rest of the interview at my house being that the children are not feeling well, you have got th only document s pertaining to my case. Look forward to seeing you this afternoon . Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Friday, 18 February 2011 7:25 AM
To: Virginia Giuffre

Hi there
Have been up all night writing. Won't have an opinion from our lawyer on how much can be published until London wakes up. The lawyers wanted internal FBI documents but I think the Justice Dept letter is all you have from the feds??? Anyway can I give you a call early afternoon? Maybe have a late lunch?
S

EXHIBIT 35
(Filed Under Seal)

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Sun 2/13/2011 4:29:38 AM
Importance: Normal
Subject: RE: Agreements etc
Received: Sun 2/13/2011 4:29:38 AM

Hi Sharon, my address is [redacted] call me back for the directions from gosford and my hubby will lead the wa
from there.

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Saturday, 12 February 2011 2:10 AM
To: Virginia Giuffre
Subject: Agreements etc

Hi there,

Thank you again for your email.

We totally understand your concerns. Please don't worry about anything. Whatever happens, we are bound by confidentiality unless you consent to an article in a formal contract signed by you.

Since I will be in the air by the time you wake up, can you email our Assistant Editor Sian James -- sian.james@mailonsunday.co.uk -- your lawyer's information please?

Sian will arrange to get him whatever assurances he requires. We really want to make this work and of course we want to protect you.

We'll be really grateful if your lawyer will provide us his cell phone number as we'd like to sort this all out asap. Meaning we would like to talk to him Saturday EST.

I will give you a call from Sydney. Fingers crossed we get over this last hurdle!

Best regards,
Sharon

EXHIBIT 36
(Filed Under Seal)

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Jenna
Sent: Fri 2/25/2011 10:12:25 PM
Importance: Normal
Subject: RE: Re:
Received: Fri 2/25/2011 10:12:25 PM

The flight logs didn't come through properly,could you please resend them? Thanks- Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Saturday, 26 February 2011 7:56 AM
To: Virginia Giuffre
Subject: Re:

Can u look at the flight logs I just sent and see if any ring a bell re
Virgin Is/Andrew orgy please?
S
X0

|------------>
|From: |
|------------>
>--|
|
>--|
|------------>
|To: |
|------------>
>--|
|Sharon Churcher |
>--|
|------------>
|Date: |
|------------>
>--|
|25/02/2011 20:54 GMT |
>--|
|------------>
|Subject: |
|------------>
>--|
|RE: |
>--|

Hi shazza,
I am hoping it all goes well this a.m, please let me know when you know
something. As far as other publications go, I am happy for your company to
decide as long as I am not made out to be a vixen...you know my
taste...he..he..!
Talk to you soon buddy! =) Jenna

-----Original Message-----
From: Sharon.Churcher@mailonsunday.co.uk
Sent: Saturday, 26 February 2011 6:46 AM
To: Virginia Giuffre

So far it is all looking good. Waiting for a comment from Andrew. Will let
you know as soon as we get it.

Are there any publications to whom you do not want the piece syndicated?
(You get 50 per cent of the proceeds).

This e-mail and any attached files are intended for the named addressee only. It contains information, which may be confidential and legally privileged and also protected by copyright. Unless you are the named addressee (or authorised to receive for the addressee) you may not copy or use it, or disclose it to anyone else. If you received it in error please notify the sender immediately and then delet it from your system. Please be advised that the views and opinions expressed in this e-mail may not reflect the views and opinions of Associated Newspapers Limited or any of its subsidiary companies. We make every effort to keep our network free from viruses. However, you do need to check this e-mail and any attachments to it for viruses as we can take no responsibility for any computer viru which may be transferred by way of this e-mail. Use of this or any other e-mail facility signifies consent to any interception we might lawfully carry out to prevent abuse of these facilities.
Associated Newspapers Ltd. Registered Office: Northcliffe House, 2 Derry St, Kensington, London, W8 5TT. Registered No 84121 England.

EXHIBIT 37
(Filed Under Seal)

UNITED STATES DEPARTMENT OF STATE
APPLICATION FOR ☐ PASSPORT ☐ REGISTRATION
(Type or print all capital letters in blue or black ink in white areas only)

1. NAME (First and Middle) VIRGINIA LEE
LAST ROBERTS

112487073
☐ 5 Yr. ☐ 10 Yr. Issue Date JAN 12 2001
R D O DP
End. # 21 Exp. 1-10-02

2. MAIL PASSPORT TO: STREET / RFD # OR P.O. BOX [redacted] APT. #
CITY Loxahatchee STATE FL
ZIP CODE 33470 COUNTRY / IN CARE OF (if applicable) USA

3. SEX ☐ M ☒ F
4. PLACE OF BIRTH (City & State or City & Country) Sacramento California
5. DATE OF BIRTH [redacted]
6. SOCIAL SECURITY NUMBER SEE FEDERAL TAX LAW NOTICE ON PAGE 2 Personal Information

7. HEIGHT Feet 5 Inches 07
8. HAIR COLOR Blonde
9. EYE COLOR Blue Green
10. HOME TELEPHONE [redacted]
11. BUSINESS TELEPHONE (Cell)
12. OCCUPATION Masseuse

13. PERMANENT ADDRESS (DO NOT LIST P.O. BOX) [redacted] STREET/RFD # CITY Loxahatchee STATE FL ZIP CODE 33470

14. FATHER'S FULL NAME Last Roberts First Sky BIRTHPLACE California [redacted] U.S. CITIZEN ☐ Yes ☐ No
15. MOTHER'S FULL MAIDEN NAME Last Caroll First Lynn Roberts BIRTHPLACE [redacted] U.S. CITIZEN ☐ Yes ☐ No

16. HAVE YOU EVER BEEN MARRIED? ☐ Yes ☐ No SPOUSE'S OR FORMER SPOUSE'S FULL NAME AT BIRTH Last First BIRTHPLACE BIRTHDATE U.S. CITIZEN ☐ Yes ☐ No

DATE OF MOST RECENT MARRIAGE Month Day Year WIDOWED/DIVORCED? ☐ Yes Give Date Month Day Year ☐ No
17. OTHER NAMES YOU HAVE USED (1) (2)

18. HAVE YOU EVER BEEN ISSUED A U.S. PASSPORT? ☐ Yes ☒ No IF YES, COMPLETE NEXT LINE AND SUBMIT PASSPORT IF AVAILABLE. DISPOSITION ☐ Submitted ☐ Stolen ☐ Lost ☐ Other
NAME IN WHICH ISSUED MOST RECENT PASSPORT NUMBER APPROXIMATE ISSUE DATE Month Day Year



It is necessary to submit a statement with an application for a new passport when a previous valid or potentially valid passport cannot be presented. The statement must set forth in detail why the previous passport cannot be presented. Use Form DSP-64.

19. EMERGENCY CONTACT. If you wish, you may supply the name, address and telephone number of a person not traveling with you to be contacted in case of emergency.
NAME James Austrich
TELEPHONE [redacted] RELATIONSHIP Fiancé

20. TRAVEL PLANS (not mandatory) Month Day Year
Date of Trip 01 13 01
Length of Trip 01/21/01
COUNTRIES TO BE VISITED London, Thailand

21. STOP. DO NOT SIGN APPLICATION UNTIL REQUESTED TO DO SO BY PERSON ADMINISTERING OATH
I have not, since acquiring United States citizenship, performed any of the acts listed under "Acts or Conditions" on the reverse of this application form (unless explanatory statement is attached). I solemnly swear (or affirm) that the statements made on this application are true and the photograph attached is a true likeness of me.

X Parent's/Legal Guardian's Signature (if identifying minor child)
X Virginia Roberts Applicant's Signature - age 13 or older

22. FOR ACCEPTANCE AGENT'S USE
Subscribed and sworn to (affirmed) before me
FOIA: (b)(6)
(Signature of person authorized to accept application)
Month Day Year (SEAL)
☐ Clerk of Court, Location
☐ PASSPORT Agent
☐ Postal Employee
☐ Agent Consul USA

23. APPLICANT'S IDENTIFYING DOCUMENTS
☒ DRIVER'S LICENSE ☐ PASSPORT ☐ OTHER (Specify)
ISSUE DATE Month Day Year
EXPIRATION DATE Month Day Year
ID No. [redacted]
PLACE OF ISSUE FL ISSUED IN THE NAME OF Virginia Roberts

24. FOR ISSUING OFFICE USE ONLY (Applicant's evidence of citizenship)
☐ Birth Certificate SR CR City Filed/Issued: Sacramento California
☐ Passport Bearer's Name:
☐ Report of Birth
☐ Naturalization/Citizenship Cert. No.
☐ Other:
☐ Seen & Returned
☐ Attached

FOIA: (b)(6)

25. FEE 45 EXEC 15 EF 35 OTHER

FORM DSP-11 (12-97) (SEE INSTRUCTIONS ON PAGE 2)
Page 1
Form Approved OMB No. 1405-0004 (Exp. 5/31/2001) Estimated Burden - 20 Minutes*

EXHIBIT 38
(Filed Under Seal)

CASE HISTORY/ASSESSMENT PLAN

NAME: Virginia Guiffre DATE: 6.9.11

ADDRESS: [redacted]

Glenning Valley

PHONE NUMBERS: [redacted]

(H)____ (W)____ (M) [redacted]

AGE: 28 DOB: [redacted] PRIVATE HEALTH INS. ____

FAMILY BACKGROUND/HISTORY

SINGLE (Not in a relationship) ____

SINGLE (In a relationship) - NAME ____ AGE ____

How long ____ Description of partner ____

DE FACTO RELATIONSHIP - NAME ____ AGE ____

How long ____ Description of partner ____

CHILDREN OF RELATIONSHIP:

SONS ____

DAUGHTERS: ____

MARRIED: Name Robert AGE: 40

How long 9 y Description of spouse ____

Description of shared relationship: Good rel

CHILDREN:

SONS: [redacted]

DAUGHTERS: [redacted]

PREVIOUS MARRIAGES/SIGNIFICANT RELATIONSHIPS

1. NAME ____ HOW LONG ____

Reason relationship finished ____

CHILDREN: ____

REFERRAL SOURCE Private (Robert)

FAMILY HISTORY:

MOTHER: AGE 51 HEALTH

when V was 30 Stan - goodman

MARITAL STATUS: MARRIED: SEPARATED: DIVORCED: REMARRIED:

New partner:

Foster care twice

Relationship with Mother: Self:

DESCRIPTION OF MOTHER. CARING/LOVING ---- NURTURING ---- POSITIVE ----

SUPPORTIVE ---- SENSITIVE ---- DOMINANT ---- NEGATIVE ---- CONTROLLING ----

MANIPULATIVE ---- DEPENDENT ---- SUBSTANCE ABUSE ----

felt abandoned

Alcoholic

ENVIRONMENTAL /GENERATIONAL FACTORS:

DESCRIPTION OF RELATIONSHIP:

CLOSE---- VERY CLOSE ---- STRAINED ---- DISTANT ----NON EXISTENT ----

FATHER: AGE 52 HEALTH

MARITAL STATUS: MARRIED ---- SEPARATED ---- DIVORCED ---- REMARRIED----

NEW PARTNER

RELATIONSHIP WITH SELF

DESCRIPTION OF FATHER. CARING----LOVING----NURTURING----POSITIVE----

SUPPORTIVE----SENSITIVE----DOMINANT----NEGATIVE----CONTROLLING----

MANIPULATIVE----DEPENDENT----SUBSTANCE ABUSE----

ENVIRONMENTAL/GENERATIONAL FACTORS:

DESCRIPTION OF RELATIONSHIP: CLOSE----VERY CLOSE----STRAINED----

DISTANT----NON EXISTENT----

SIBLINGS – BIOLOGICAL/STEP/BLENDED

Mother's 1st Marriage

BROTHERS USA Distant | SISTERS

½ 33 Danny

USA 23 Skye v close

Single /Married/de facto/Separated/Divorced/Children

RELATIONSHIP: VERY CLOSE ---- CLOSE ----DISTANT----NON EXISTENT----

DESCRIPTION OF FAMILY RELATIONSHIP: VERY CLOSE ----CLOSE ----DISTANT---

CHILDHOOD/ADOLESCENT HISTORY

Major illnesses/operations Kidney problems

DESCRIPTION OF SELF AS A CHILD: BRIGHT---HAPPY---OUTGOING---LEADER---

COMPLIANT---LONER---UNHAPPY---HIGH ACHIEVER---TROUBLED---

DESCRIPTION OF SELF AS A TEENAGER: BRIGHT---HAPPY---OUTGOING---LEADER---

COMPLIANT---LONER---UNHAPPY---HIGH ACHIEVER---TROUBLED---

RELATIONSHIP WITH PEERS/TEACHERS ---

EDUCATIONAL HISTORY

School leaving year ______ HSC ______

Tertiary studies/University ( )

Studied ...... AT ......

Timespan ......

EMPLOYMENT HISTORY

Present position ______

Company ______ Length of time ______

Plans for the future ______

PREVIOUS POSITIONS ______

MEDICAL & PSYCHOLOGICAL HISTORY (ADULT)

Significant illnesses/operations/treatment Shingles Polycystic Ovaries

PRESENT GENERAL HEALTH Good

MEDICATION —

Substance abuse: Alcohol Excess Nicotine — Other drug taking Marijuana to excess

PREGNANCY HISTORY: Number of pregnancies 3

Miscarriages Ectopic 13-19 entrapped

Terminations ______
(Effect/ reasonable/ bad/still affected by decision)

ANXIETIES/CONCERNS/FEARS ______

① Flashbacks ② Anxiety re safety (from book) with family

10/10

GIUFFRE005435
CONFIDENTIAL

PHOBIAS ______________________________

DESCRIPTION OF PRESENT PROBLEM ______________________________

____

TIME OF ONSET/SYMPTOMS ______________________________

SLEEP PATTERNS: Good/falls asleep easily/ reasonable/poor/difficulty staying asleep/

Awakens through night/ unable to go back to sleep

AWAKENS FEELING: Good/tired/down/ Morning person/ Night person

Awareness of mental disorder in family unit/origin ______________________________

____

MEMORY: Good/reasonable/poor –

SUICIDAL THOUGHTS: Thoughts only/serious/contemplation

Attempts and manner ______________________________

Intervention ______________________________

EPILEPSY - YES/NO

RELAXATION/INTERESTS (Hobbies recreational interests)

Walking/cooking/theatre/music/cinema/sport/bush walking/craft/woodwork ______________

Shared with partner ______________________________

Philosophy/belief system: God

Purpose/meaning of life: To be the best – do no harm ☺

(C.ess.,/ Roles/int.ext./Aut.Ind./Cen/Bal./Exsp./Exp./Resp.self/Ks.-non-j-c./w.dem.exp./fgv..uncnd./
diminished in .... reclaiming in ....

Acknowledged – validation – recognition - ----ws. – not – sif.)

HYPNOSIS SUGGESTED ....Explanation/description of Hypnosis/Pamphlet ....

HYPNOTIC FORMAT: ......Relaxation response/counting 1-20/Ideomotor/eye catalepsy/

HOW RECEPTIVE 1 2 3 4 5 6 7 8 9 10 APPROPRIATE FOR FUTURE WORK --------

TREATMENT PLAN/FOCUS:

Mindfulness-based CBT strategies for PTSD
Reframing of very damaged cognitions from past
Remarkable young woman – supportive therapy needed

5

DATE: PROGRESS:

Many issues from past – to take segments piece by piece – extraordinary past. At 13 a runaway – raped by an older man (escort agency). Police involved.
Parents then sent her to California – raised in Florida by an artist – left Dinkeweas sent back to Florida (group facility home).
A Limo picked her up (Ron Eppinger) – escort was 'paraded' around by him – he went to jail.
Returned to parents & school. At 15 worked as a locker room assistant/helped in massage area/house maid/receptionist.
Decided to be a massage therapist – went to Library to research Anatomy & was approached by Miss Christine Maxwell who said she could help her get a job as a massage therapist. Virginia's father worked in maintenance at the resort. Was offered an interview (father went as well). Seemed respectable: 1st impression good. V then went upstairs & was shown – how to massage etc. (Geoff Epstein) Told to undress & perform sexual acts on person. Miss Maxwell promised her $200 a job (preyed upon) told 'that's what life is all about' – they were rich & powerful & V. was promised a full massage certificate (later) to be sent away for training ? place.
Had training sexually as how to please a man etc. Still lived with parents until

6

DATE: PROGRESS:

Put in an apartment in New York
[illegible] — used — At 19 V. wanted
to become qualified & was sent to Thailand
a cheap training course in Massage.

Met Robert in Thailand who offered to marry
her & take her back to Australia where
he lived.

More sessions required re PTSD

EXHIBIT 39
(Filed Under Seal)

Date: 7/25/06 PALM BEACH POLICE DEPARTMENT Page: 1
Time: 8:47:53 Incident Report Program: CMS301L

Case No. . . . . : 1-05-000368
SPECIAL NOTES : DO NOT RELEASE
Occur From Date: 1/27/05 0000
Occur To Date : 1/27/05 0000
Report Date . : 3/14/05 1600
Day Of Week . : Thursday
Common/Location: 358 EL BRILLO WY
City . . . . . . : PALM BEACH, FL
Location Type : RESIDENCE-SINGLE FAMILY
Beat Assignment: DETECTIVE BUREAU
Map Reference : 10
Dept Class . . : SEXUAL BATTERY
Report Officer : PAGAN, MICHELE
Case Status . : OPEN / ACTIVE
Case Status Dt : 3/14/05
Supervisory Dt.: TRYLCH, JEFFREY 3/14/05
Entry Date . . : OREGERO, LAURA 4/06/05
Names? . . . . :
Property? . . :
Vehicles? . . :
Offenses? . . :
Narrative? . . :
Related Cases? :

********* V E H I C L E I N F O R M A T I O N # 1 ********************

Case number . : 1-05-000368
Category . . . :
State Veh Type :
Year . . . . . . : 0
Make . . . . . :
Model . . . . :
Model Name . . :
Permit Number :
Style . . . . :
Color - Top . :
Color - Bottom :
License # . . :
VIN . . . . . :
Stolen value . : 0
Disposition . :
Insured . . . :
Insured by . . :
Keys in car . :
Vehicle locked :
Lein holder . :
Date recovered : 0/00/00
Recovery value : 0
Street number :
City . . . . . :
Recovery code :
NCIC number . :
Be On Look Out?:

********* P E R S O N R E P O R T I N G I N F O - # 1 *********

Case Number . : 1-05-000368
Last Name . . . : [REDACTED]
Street Number : [REDACTED]
City . . . . . : [REDACTED]
Birth Date/Age : [REDACTED]
Employer? . . :
Occupation . . :
Oper Lic No. . : [REDACTED]
Home Phone No. : [REDACTED]
Race . . . . . : White
Sex . . . . . : Female
Height . . . . : 0
Weight . . . . : 0
Other Phone Nbr:

************** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 1 **

Case Number . : 1-05-000368
Prompt valid in: ROBSON, HALEY
Street Number : [REDACTED]
City . . . . : ROYAL PALM BEACH, FL 334121460
Birth Date . . : [REDACTED]
Maximum Age . : 18
Employer? . . :
Occupation . . :
Oper Lic No. . : [REDACTED]
Home Phone No. :
Other Phone Nbr:
Race . . . . . : White
Sex . . . . . : Female
Minimum Height : 0
Minimum Weight : 0
Maximum Height : 0

Case No. . . . . : 1-05-000368 (Continued)
Maximum Weight : 0 Misc. ID# . . . :
Aliases? . . . . : MO/Crime Spec? :
Hair Color . . . : Hair Length . . :
Hair Style . . . : Eye Color . . . :
Glasses . . . . : Complexion . . . :
Facial Hair . . : Build . . . . . :
Teeth . . . . . : Speech . . . . . :
Hat . . . . . . : Coat . . . . . . :
Shirt . . . . . : Pants . . . . . :
Shoes . . . . . : Body Marks #1 :
Body Marks #2 : Body Marks #3 :
Body Marks #4 : Status . . . . . : STILL SUSPECT
Arrest Case No.: Additional UCR?:

************** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 2 **
Case Number . . : 1-05-000368 Prompt valid in: KELLEN, SARAH LYNNELLE
Street Number : 358 EL BRILLO WY
City . . . . . . : PALM BEACH, FL 000033480
Birth Date . . : Maximum Age . : 25
Employer? . . . : Occupation . . . : PERSONAL ASST/EPSTEIN
Oper Lic No. . : Home Phone No. : 561/000-0000
Other Phone Nbr: 561/000-0000 Race . . . . . . : White
Sex . . . . . . : Female Minimum Height : 0
Minimum Weight : 0 Maximum Height : 0
Maximum Weight : 0 Misc. ID# . . . :
Aliases? . . . . : MO/Crime Spec? :
Hair Color . . . : Hair Length . . :
Hair Style . . . : Eye Color . . . :
Glasses . . . . : Complexion . . . :
Facial Hair . . : Build . . . . . :
Teeth . . . . . : Speech . . . . . :
Hat . . . . . . : Coat . . . . . . :
Shirt . . . . . : Pants . . . . . :
Shoes . . . . . : Body Marks #1 :
Body Marks #2 : Body Marks #3 :
Body Marks #4 : Status . . . . . : STILL SUSPECT
Arrest Case No.: Additional UCR?:

************** S U S P E C T / A R R E S T E E I N F O R M A T I O N - # 3 **
Case Number . : 1-05-000368 Prompt valid in: EPSTEIN, JEFFREY
Street Number : 358 EL BRILLO WY
City . . . . . . : PALM BEACH, FL 000033480
Birth Date . . : Maximum Age . : 52
Employer? . . . : Occupation . . . :
Oper Lic No. . : Home Phone No. :
Other Phone Nbr: Race . . . . . . : White
Sex . . . . . . : Male Minimum Height : 0
Minimum Weight : 0 Maximum Height : 0
Maximum Weight : 0 Misc. ID# . . . :
Aliases? . . . . : MO/Crime Spec? :
Hair Color . . . : Hair Length . . :
Hair Style . . . : Eye Color . . . :

Case No. . . . . : 1-05-000368 (Continued)
Glasses . . . . :
Complexion . . :
Facial Hair . :
Build . . . . :
Teeth . . . . :
Speech . . . . :
Hat . . . . . . :
Coat . . . . . :
Shirt . . . . :
Pants . . . . :
Shoes . . . . :
Body Marks #1 :
Body Marks #2 :
Body Marks #3 :
Body Marks #4 :
Status . . . . : STILL SUSPECT
Arrest Case No.:
Additional UCR?:

************** V I C T I M I N F O R M A T I O N - # 1 ********************
Case Number . : 1-05-000368
Prompt valid in: [REDACTED]
Street Number : [REDACTED]
City . . . . . : [REDACTED]
Birth Date/Age : [REDACTED] 14
Employer? . . :
Occupation . . : STUDENT
Oper Lic No. . :
Home Phone No. : [REDACTED]
Race . . . . . : White
Sex . . . . . : Female
Height . . . . : 0
Weight . . . . : 0
Misc. ID# . . :
Be On Look Out?:
Other Phone Nbr:
Victim Type . : JUVENILE
Residency Type :
Residency Sts :
File Charges . :
Can Identify . :
Victim Sobriety:
Injury Extent :
Injury Type 1 :
Injury Type 2 :
Hospital ID . :
Med Treatment :
Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 2 ********************
Case Number . : 1-05-000368
Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 18
Employer? . . :
Occupation . . :
Oper Lic No. . :
Home Phone No. : 561/000-0000
Race . . . . . : White
Sex . . . . . : Female
Height . . . . : 0
Weight . . . . : 0
Misc. ID# . . :
Be On Look Out?:
Other Phone Nbr: 561/000-0000
Victim Type . : ADULT
Residency Type :
Residency Sts :
File Charges . :
Can Identify . :
Victim Sobriety:
Injury Extent :
Injury Type 1 :
Injury Type 2 :
Hospital ID . :
Med Treatment :
Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 3 ********************
Case Number . : 1-05-000368
Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 16
Employer? . . :

(Continued)

Case No. . . . : 1-05-000368
Occupation . . :
Home Phone No. : 561/000-0000
Sex . . . . . . : Female
Weight . . . . . : 0
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :

Oper Lic No. . :
Race . . . . . . : White
Height . . . . . : 0
Misc. ID# . . :
Other Phone Nbr: 561/000-0000
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

************** V I C T I M I N F O R M A T I O N - # 4 *******************

Case Number . : 1-05-000368
Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 17
Occupation . . :
Home Phone No. : 561/000-0000
Sex . . . . . . : Female
Weight . . . . . : 0
Be On Look Out?:
Victim Type . : JUVENILE
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :

Employer? . . :
Oper Lic No. . :
Race . . . . . . : White
Height . . . . . : 0
Misc. ID# . . :
Other Phone Nbr: 561/000-0000
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

************** V I C T I M I N F O R M A T I O N - # 5 *******************

Case Number . : 1-05-000368
Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 18
Occupation . . :
Home Phone No. : 561/000-0000
Sex . . . . . . : Female
Weight . . . . . : 0
Be On Look Out?:
Victim Type . : ADULT
Residency Sts :
Can Identify . :
Injury Extent :
Injury Type 2 :
Med Treatment :
Phys Last Name :

Employer? . . :
Oper Lic No. . :
Race . . . . . . : White
Height . . . . . : 0
Misc. ID# . . :
Other Phone Nbr: 561/000-0000
Residency Type :
File Charges . :
Victim Sobriety:
Injury Type 1 :
Hospital ID . :
Phys First Name:

************** V I C T I M I N F O R M A T I O N - # 6 *******************

Case Number . : 1-05-000368
Prompt valid in: [REDACTED]

Case No. . . . . : 1-05-000368 (Continued)
Street Number :
City . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] 16 Employer? . . . :
Occupation . . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . . : Female Height . . . . . : 0
Weight . . . . . : 0 Misc. ID# . . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 7 *******************
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] 17 Employer? . . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . . : Female Height . . . . . : 0
Weight . . . . . : 0 Misc. ID# . . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 8 *******************
Case Number . : 1-05-000368 Prompt valid in: [redacted]
Street Number :
City . . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [redacted] 16 Employer? . . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . . : Female Height . . . . . : 0
Weight . . . . . : 0 Misc. ID# . . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************* V I C T I M I N F O R M A T I O N - # 9 *******************

(Continued)

Case No. . . . : 1-05-000368
Case Number . : 1-05-000368 Prompt valid in: [REDACTED]
Street Number . :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 17 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 10 ******************
Case Number . : 1-05-000368
Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 17 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 11 ******************
Case Number . : 1-05-000368 Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 18 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : ADULT Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:

Case No. . . . : 1-05-000368 (Continued)
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 12 ******************

Case Number . : 1-05-000368 Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 18 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . : Female Height . . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : ADULT Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 13 ******************

Case Number . : 1-05-000368 Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 16 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . : Female Height . . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :
Injury Type 2 : Hospital ID . :
Med Treatment : Phys First Name:
Phys Last Name :

************** V I C T I M I N F O R M A T I O N - # 14 ******************

Case Number . : 1-05-000368 Prompt valid in: [REDACTED]
Street Number :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 16 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . : Female Height . . . . . : 0
Weight . . . . : 0 Misc. ID# . . :
Be On Look Out?: Other Phone Nbr: 561/000-0000
Victim Type . : JUVENILE Residency Type :
Residency Sts : File Charges . :
Can Identify . : Victim Sobriety:
Injury Extent : Injury Type 1 :

```
Date:  7/25/06              PALM BEACH POLICE DEPARTMENT              Page:       8
Time:  8:47:53                    Incident Report                    Program: CMS301L

Case No. . . . : 1-05-000368                                          (Continued)
Injury Type 2  :                            Hospital ID  . :
Med Treatment  :                            Phys First Name:
Phys Last Name :

************** V I C T I M    I N F O R M A T I O N  - # 15 ******************
Case Number  . : 1-05-000368                Prompt valid in: [REDACTED]
Street Number  :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 19              Employer?  . . :
Occupation . . :                            Oper Lic No. . :
Home Phone No. : 561/000-0000               Race . . . . . : White
Sex  . . . . . : Female                     Height . . . . : 0
Weight . . . . : 0                          Misc. ID#  . . :
Be On Look Out?:                            Other Phone Nbr: 561/000-0000
Victim Type  . : ADULT                      Residency Type :
Residency Sts  :                            File Charges . :
Can Identify . :                            Victim Sobriety:
Injury Extent  :                            Injury Type 1  :
Injury Type 2  :                            Hospital ID  . :
Med Treatment  :                            Phys First Name:
Phys Last Name :

************** V I C T I M    I N F O R M A T I O N  - # 16 ******************
Case Number  . : 1-05-000368                Prompt valid in: [REDACTED]
Street Number  :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 17              Employer?  . . :
Occupation . . :                            Oper Lic No. . :
Home Phone No. : 561/000-0000               Race . . . . . : White
Sex  . . . . . : Female                     Height . . . . : 0
Weight . . . . : 0                          Misc. ID#  . . :
Be On Look Out?:                            Other Phone Nbr: 561/000-0000
Victim Type  . : JUVENILE                   Residency Type :
Residency Sts  :                            File Charges . :
Can Identify . :                            Victim Sobriety:
Injury Extent  :                            Injury Type 1  :
Injury Type 2  :                            Hospital ID  . :
Med Treatment  :                            Phys First Name:
Phys Last Name :

************** V I C T I M    I N F O R M A T I O N  - # 17 ******************
Case Number  . : 1-05-000368                Prompt valid in: [REDACTED]
Street Number  :
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : [REDACTED] 16              Employer?  . . :
Occupation . . :                            Oper Lic No. . :
Home Phone No. : 561/000-0000               Race . . . . . : White
Sex  . . . . . : Female                     Height . . . . : 0
Weight . . . . : 0                          Misc. ID#  . . :
Be On Look Out?:                            Other Phone Nbr: 561/000-0000
Victim Type  . : JUVENILE                   Residency Type :
Residency Sts  :                            File Charges . :
```

Case No. . . . : 1-05-000368 (Continued)
Can Identify . :
Victim Sobriety:
Injury Extent :
Injury Type 1 :
Injury Type 2 :
Hospital ID . :
Med Treatment :
Phys First Name:
Phys Last Name :

********* O T H E R P E R S O N I N F O R M A T I O N - # 1 *********
Case Number . : 1-05-000368 Last Name . . :
Street Number :
City . . . . . : WEST PALM BEACH, FL 33411
Birth Date/Age : 14 Employer? . . :
Occupation . . : STUDENT Oper Lic No. . :
Home Phone No. : Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 2 *********
Case Number . : 1-05-000368 Last Name . . : MARCINKOVA, NADA
Street Number : 358 EL BRILLO WY
City . . . . . : PALM BEACH, FL 000033480
Birth Date/Age : 19 Employer? . . :
Occupation . . : Oper Lic No. .
Home Phone No. : Race . . . . . : White
Sex . . . . . : Female Height . . . . : 510
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 3 *********
Case Number . : 1-05-000368 Last Name . . :
Street Number :
City . . . . . : ROYAL PALM BEACH, FL 33411
Birth Date/Age : 35 Employer? . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 4 *********
Case Number . : 1-05-000368 Last Name . . :
Street Number :
City . . . . . :
Birth Date/Age : 37 Employer? . . :
Occupation . . : PAINTER Oper Lic No. . :
Home Phone No. : Race . . . . . : White
Sex . . . . . : Male Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 5 *********
Case Number . : 1-05-000368 Last Name . . :

Case No. . . . . : 1-05-000368 (Continued)
Street Number :
City . . . . . . :
Birth Date/Age : 0/00/0000 0 Employer? . . . :
Occupation . . : FAMILY THERAPIST Oper Lic No. . :
Home Phone No. : 561/000-0000 Race . . . . . . : White
Sex . . . . . . : Female Height . . . . . : 0
Weight . . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: 561/000-0000

EMPLOYER INFORMATION

Case Number . : 1-05-000368
Employer Name : PBC DIVISON OF YOUTH AFFAIRS
Address . . . . : 4200 N AUSTRALIAN AV
City/State/Zip : WEST PALM BEACH, FL 33407
Phone Number . : 561/840-4540

********* O T H E R P E R S O N I N F O R M A T I O N - # 6 *********

Case Number . : 1-05-000368 Last Name . . . : [REDACTED]
Street Number : [REDACTED]
City . . . . . . : WELLINGTON, FL 33414
Birth Date/Age : [REDACTED] 16 Employer? . . . :
Occupation . . : STUDENT Oper Lic No. . :
Home Phone No. : [REDACTED] Race . . . . . . : White
Sex . . . . . . : Male Height . . . . . : 0
Weight . . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

EMPLOYER INFORMATION

Case Number . : 1-05-000368 Employer Name : SUMMIT CHRISTIAN SCHOOL
Address . . . . : 4900 SUMMIT BV
City/State/Zip : WEST PALM BEACH, FL 33415
Phone Number . :

********* O T H E R P E R S O N I N F O R M A T I O N - # 7 *********

Case Number . : 1-05-000368 Last Name . . . : [REDACTED]
Street Number : [REDACTED]
City . . . . . . : [REDACTED]
Birth Date/Age : 0/00/0000 0 Employer? . . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [REDACTED] Race . . . . . . : White
Sex . . . . . . : Male Height . . . . . : 0
Weight . . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 8 *********

Case Number . : 1-05-000368 Last Name . . . : [REDACTED]
Street Number : [REDACTED]
City . . . . . . : [REDACTED]
Birth Date/Age : 0/00/0000 0 Employer? . . . :
Occupation . . : Oper Lic No. . :
Home Phone No. : [REDACTED] Race . . . . . . :
Sex . . . . . . : Female Height . . . . . : 0

Case No. . . . : 1-05-000368 (Continued)
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr:

********* O T H E R P E R S O N I N F O R M A T I O N - # 9 *********

Case Number . : 1-05-000368 Last Name . . :
Street Number :
City . . . . . :
Birth Date/Age : 16 Employer? . . :
Occupation . . : Oper Lic No. .
Home Phone No. : 561/000-0000 Race . . . . . : White
Sex . . . . . : Female Height . . . . : 0
Weight . . . . : 0 Person Type . : OTHER PERSON
Other Phone Nbr: 561/000-0000

*************************** N A R R A T I V E # 1 ***************************

Original Report LO Reported By: PAGAN, MICHELE D. 9/20/05
Entered By.: OREGERO, LAURA D. 9/20/05

On 03/14/2005, I received a call from a woman who did not wish to identify herself (later identified as . She stated that her fourteen year old step daughter (later identified as) possibly may have been molested in Palm Beach by a wealthy man. According to , she learned of the possible molestation by a third party. She explained that she had received a call from the mother of her stepdaughter's friend. The mother claimed to have overheard a conversation between her daughter and a male friend; they were talking about . The conversation was about how had met with a 45-year-old man and had sex with him and was paid for it. I advised that I would like to meet with her to obtain a more detailed statement and facts. stated she did not know what to do and had to discuss the matter with her husband. At this point did not provide me with a call back number or any other information. She stated that she would contact me once she had spoken with her husband and 's mother.

On 03/14/2005 received a call from Mr. & Mrs. . They stated it was all right to speak to their daughter via cell phone . Her mother had been made aware of the case. They agreed to meet me at the police department later this date.

On 03/14/2005, Mr. accompanied by his wife came to the Palm Beach Police Department where they advised me that they believed their fourteen year old daughter may have had some type of sexual relationship with an older male who resided in Palm Beach. Neither knew the suspect's name or address. Both stated that their daughter did not talk to them about the incident, nor would she admit to it.

identified his daughter as , w/f, DOB resides with her biological mother at . is a twin,

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her sister [redacted] resides with Mr. [redacted]. Both [redacted] and [redacted] are currently attending [redacted] school, which is an involuntary admitted juvenile educational facility. [redacted] stays at the facility during the week and comes home on the weekend. According to [redacted], she was admitted to the school because of disciplinary problems that recently escalated. The facility also coordinates with the families to provide one on one as well as family counseling.

According to Mrs. [redacted], she believes the incident occurred on Sunday, Feb 6, 2005. A friend of [redacted]'s, named Haley picked her up at their house and left. They believe Haley initiated the relationship with the older gentleman, though they do not have any proof. Haley lives close by with her mother. Mrs. [redacted] further explained that [redacted] was introduced to Haley by [redacted], a boy she was dating (goes to [redacted], plays baseball). Mrs. [redacted] continued that on Sunday, Haley picked up [redacted], and drove to Palm Beach where they met the man. Supposedly, the man has a lot of money and often has young girls come over to his house. Haley offers these girls a way to make fast cash. The man starts with a massage. If he likes them, he keeps them around and does more. The [redacted] did not have any information on Haley other than she lives on [redacted], the last house on right side (north side).

Mrs. [redacted] talked of a conversation that she had with [redacted], the mother of [redacted] a former friend of [redacted]s. She found it strange that they were no longer friends until she received the call from her mother telling her of the conversation she overheard between [redacted] and a boy named [redacted].

Mrs. [redacted] told me of an incident that occurred on 02/09/2005. [redacted] got into a fight at school [redacted]. Mrs. [redacted] Assistant Principal, found over $300.00 in [redacted]s purse. [redacted] gave different explanations for the large sum of money. Initially the school administration thought it was drug related but then dismissed the claim. Since that day, [redacted] did not return to school; she ran away Thursday, 02/10th or Friday 02/11 and returned to her mother's house later that night after midnight. It was not until after [redacted] received the call from [redacted]s mother, [redacted] [redacted] that she learned [redacted] was the girl that got into the fight with [redacted]. The fight was instigated when [redacted] accused [redacted] of being a prostitute.

[redacted] who has legal joint custody of his daughter [redacted] [redacted], signed the affidavit of prosecution indicating he wished to prosecute against the inappropriate sexual behavior with his fourteen-year-old daughter.

Mr. [redacted] stated that he had no objections with our agency speaking with his daughter [redacted] about the incident. Mr. [redacted] stated that [redacted]s mother [redacted] is aware of the allegations and also was willing to cooperate. According to Mrs. [redacted] she does not believe her daughter had any additional contact with the suspect as she was with

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her mother and then placed into [REDACTED]

I contacted the School Board Police who provided me the information for [REDACTED] West Palm Beach, Florida. Checking the school board records for [REDACTED] and [REDACTED], there was no disciplinary record found. I was advised if no disciplinary action was taken for a fight, such as an expulsion or detention, the incident may not have been recorded. This was at the discretion of the individual school security and principal.

03/15/2005, I called the Palm Beach County Sheriff's Office and left a message for PBSP Sgt. Chris Keen, Child Abuse Unit.

On 03/15/2005, I went to [REDACTED] where I met with white female [REDACTED]. Also present was [REDACTED] [REDACTED]s therapist. During an audiotaped interview, I spoke with [REDACTED] about the allegations that were made. [REDACTED] initially denied anything had happened, only admitting to going with Haley (later identified as Haley Robson) to Palm Beach to pick up money Robson was owed. [REDACTED] identified Haley Robson as the cousin of her former boyfriend [REDACTED]. She ultimately admitted to knowing that Robson worked for a wealthy man and possibly did sexual favors for him. She also admitted that Robson had offered her an opportunity to make money.

[REDACTED] identified Robson's boss as a white male named "Jeff" who lived in Palm Beach (later positively identified as Jeffrey Epstein). [REDACTED] explained that she was first approached by Robson to go with her to Jeff's house, when they were at [REDACTED]s house. According to [REDACTED], she was not sure exactly what was going on with Robson but agreed to go with her. [REDACTED] ([REDACTED]s boyfriend) became angry when he heard Robson inviting [REDACTED] to accompany her. [REDACTED] believed it was to pick up money the man owed Robson. [REDACTED] stated Robson told her that she would pick her up at her house on Sunday. [REDACTED] was not sure of the exact dates but knew it was a Sunday. According to [REDACTED], Robson along with an unknown, possibly Hispanic female, picked her up at her father's house on [REDACTED] [REDACTED] told her father that they were going shopping. It was later confirmed by [REDACTED] that Robson picked his daughter up. According to Mr. [REDACTED], Robson drove a pick-up truck.

Robson drove [REDACTED] along with the unknown female to Palm Beach. Sometime on the way there, a conversation occurred between Robson and [REDACTED] whereby Robson told [REDACTED] that if Jeff asked her [REDACTED] age, she should say she was eighteen.

[REDACTED] recalled that Jeff's house was on a dead end street. All three girls walked up a driveway, past what appeared to be a small guard/security room. In fact, [REDACTED] recalled a male approaching them asking what they wanted. Robson stated they were there to see Jeff. The male allowed them to continue walking up to the house.

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[REDACTED] stated the man told them that Epstein was not there but was expected back. He allowed them to enter the house, via the kitchen. He offered them something to drink while they waited inside. Shortly after, Epstein and a woman, described as white with blond hair entered the kitchen. [REDACTED] believed the woman was Epstein's Assistant. [REDACTED] added that the woman did not seem friendly and kept her responses short and direct. Epstein introduced himself to [REDACTED] as Jeff . [REDACTED] got the impression that Epstein and Robson's friend knew each other. [REDACTED] described Epstein as being approximately forty-five years old, a long face, and bushy eyebrows, with graying hair.

Robson and Epstein left the kitchen leaving [REDACTED] and Robson's friend alone in the kitchen. They returned a short time later. They all spoke briefly in the kitchen. While speaking to me, [REDACTED] became upset and started to cry. [REDACTED] stated the woman instructed her to follow her upstairs, which she did. According to [REDACTED] the woman led her to a room that had a massage table in it. The woman started to fix up the room, putting the covers on the table and taking lotions out. She then told [REDACTED] that Epstein would be up in a second. The woman left the room, and soon after, Epstein walked in and told [REDACTED] to take off her clothes. As [REDACTED] was telling me what had happened, she looked away from me, and with a pointed finger, repeatedly pressed it into her thigh. [REDACTED] stated he was stern when he told her to take off her clothes. [REDACTED] said she did not know what to do as she was the only one there. [REDACTED] took off her shirt leaving her bra on. Epstein, dressed in a towel told her to take off everything. [REDACTED] stated she removed her pants leaving her thong panties on. Epstein then instructed her to give him a massage pointing to a specific lotion for her to use. Epstein laid on the table, face down. As [REDACTED] began to give Epstein the massage, he told her to get on his back. [REDACTED] stated she straddled herself on Epstein's back. [REDACTED] stated her exposed buttocks were touching Epstein s bare buttocks. As [REDACTED] was giving Epstein the massage, he turned around, and wacked off [REDACTED] later explained that wacking off was masturbating). [REDACTED] stated she was disgusted by Epstein's actions but did not say anything. According to [REDACTED], Epstein told her that she "had a really hot body." Epstein excused himself and went to the bathroom where she believed he masturbated again. Epstein returned to the room and told [REDACTED] that he was done and gave her three hundred dollars. They went back down stairs where they met Robson. Epstein said good-bye and they left. Robson asked [REDACTED] how did it go and asked what did she [REDACTED] do. When [REDACTED] told Robson that Epstein asked for a massage, Robson allegedly stated "I know." [REDACTED] stated they then went shopping. [REDACTED] stated Robson also got paid, but that she did not know why since she was confident that Robson did not do anything.

[REDACTED] described Epstein's house as a two story pink house with a Cadillac Escalade parked in the driveway. There were gates leading into the property. From the kitchen, [REDACTED] recalled walking up a flight of stairs, lined with photographs, to a room. Upon entering

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the room there was a large bathroom to the right. [redacted] recalled a hot pink and green sofa in the room. There was a door on each side of the sofa. [redacted] recalled there being a mural of a naked woman in the room, as well as several photographs of naked women on a shelf.

[redacted] stated Epstein did not change in front of her but did take off his towel, exposing himself. [redacted] recalled Epstein being hairy especially on his chest. Epstein also had a hairline that continued to his buttocks. [redacted] admitted to seeing his penis. I asked [redacted] if she knew what being circumcised meant and she stated no. [redacted] then said that she thought Epstein was on steroids because he was a "really built guy and his wee wee was very tiny." [redacted] would explain that when she stated "wee wee" she meant penis. [redacted] stated Epstein exposed himself when he took his towel off, placing it on the floor as he laid down on the table.

[redacted] said Epstein was specific in his instruction to her on how to massage, telling her to go clockwise, etc. [redacted] recalled that Epstein got up from the table and went to the bathroom where she heard him making, what she believed to be sexual type of noises. (moaning) He then returned to the room where he again laid down on the table. Epstein then turned over and instructed [redacted] to massage his boobs. As she did this, Epstein continued to make moaning noises.

[redacted] resumed massaging his chest area. [redacted] was now standing on the ground. Epstein turned to his side, and with the towel on the ground started to rub his penis in an up and down motion. [redacted] stated Epstein held on to the small of her back as she massaged his chest, back and shoulder area. [redacted] recalled Epstein ejaculating because he had to use the towel to wipe himself as he got off the table. [redacted] also recalled Epstein having a noticeable freckle on his chest.

Epstein then left the room and [redacted] got dressed. She went back downstairs where she met Haley and the unknown white female. [redacted] admitted to getting paid three hundred dollars in cash from Epstein. Before they left, Epstein asked [redacted] to leave her phone number. As they were leaving the house, Haley asked [redacted] what had happened and how much she was paid. [redacted] stated Haley seemed upset or jealous when she told her that she received three hundred dollars. Haley stated received only two hundred dollars that day. [redacted] stated that she believed Haley was paid two hundred dollars for bringing her.

Robson told [redacted] that if they do this every Saturday, they could be rich; [redacted] agreed. They then went shopping, though she is not sure where. Possibly at TJ Maxx or Marshall's. [redacted] stated she never saw Robson again as she got into a fight at school. She had not spoken with Robson either as her mother took away her cell phone.

I asked [redacted] if she was aware of any video equipment while she was in the room. She stated no.

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[REDACTED] stated she was afraid that Robson would retaliate against her or her family if she ever went to the police regarding the incident. [REDACTED] stated that her father's vehicle was recently vandalized. [REDACTED] admitted to telling [REDACTED] what had happened with Epstein. According to [REDACTED] became angry and upset, punching a hole in the wall. [REDACTED] guessed that it was [REDACTED] who told [REDACTED] about the incident, and now there were rumors in school about [REDACTED] and what she did with Epstein.

I then talked to [REDACTED] about truth and lying. We talked about the color sweater she was wearing. [REDACTED] denied having sexual intercourse with Epstein. She denied touching his penis. [REDACTED] again admitted to observing Epstein masturbate.

[REDACTED] agreed to cooperating with the police department in placing a phone call to Robson in a controlled setting. I met with Ms. [REDACTED] and advised her of the families' as well as [REDACTED]'s willingness to cooperate with this investigation. Copies of this interview were placed into evidence.

I made contact with [REDACTED], mother of [REDACTED]. I advised her briefly of my investigation. She was aware of the incident and stated that she overheard a portion of a conversation that her daughter was having with a boy named [REDACTED]. [REDACTED] stated that it was her opinion that both girls liked [REDACTED]. [REDACTED] recalled hearing her daughter calling [REDACTED] a whore. [REDACTED] admitted that she did not listen to the entire conversation but did confront her daughter about it later. [REDACTED] told her mother that something to the effect that [REDACTED] had slept with an older man for money. [REDACTED] stated that she would not object to me speaking with her daughter. It was [REDACTED]s belief that everyone in the school may have known about this because of the fight that her daughter [REDACTED] and [REDACTED] had gotten into. I reminded [REDACTED] that this was an ongoing investigation and requested she not discuss the fact that I had contacted her. She agreed.

On 03/16/2005, PBSO Sgt. Chris Keen left a message that he was returning my call. I spoke with Keen and discussed the case with him and inquired if he had any open allegations or cases where the suspect resided in Palm Beach. Keen stated he was unaware of any. Keen offered any assistance if needed. Keen stated it was his experience that due to the age of the parties involved, it would be difficult to interview them and expect the investigation to remain confidential.

Because of the time delay, there was no need for the victim to be taken to a medical facility for a physical for the purpose of obtaining evidence. There was also no need to take her to CPT as she was already in a juvenile facility, with an assigned therapist, in which coordinating a day and time to obtain a statement could be made.

On 03/17/2005, I queried Jeffery Epstein on the internet and obtained

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a photo of Epstein to be used in a photo line up. I met with [redacted] [redacted] at which time she viewed the photo line up. She immediately recognized Epstein and pointed to him (Position #5). [redacted] signed the photo line up under Epstein's picture. This signed line up was placed into evidence.

On 03/18/2005, I met with [redacted] at her residence for the purpose of placing a controlled call to Haley Robson. [redacted] spoke with Robson and asked if she could arrange another meeting with Jeff. Robson stated that she would have to call him and make the arrangements. A copy of this conversation was placed into evidence.

03/19/2005, I spoke with [redacted] and [redacted] and was advised that [redacted] left the state to visit with her aunt and uncle. [redacted] is scheduled to return to Florida on 03/27/2005

03/21/2005, I coordinated with PB BSF Unit and OCVAN to initiate surveillance on 358 El Brillo.

03/21/2005, Coordinated with Det. Lee regarding trash pulls from 358 El Brillo. On this same date I called [redacted] to schedule an appointment to speak with [redacted]. She stated the school guidance counselor was reluctant to have police presence at the school. I assured her that I would respond to the school in civilian clothes and an unmarked vehicle.

[redacted] called me back and advised that I did not need to make an appointment to see [redacted].

I received a return phone call from [redacted] stating that [redacted] [redacted] would be attending the family therapy sessions with [redacted].

I received messages from [redacted].

I conducted a computer query on Epstein. The results of this query indicated the most recent driver's license on file for Epstein was for the state of Florida, which had expired.

A cross reference of Epstein s residence, 358 El Brillo, Palm Beach, revealed the following affiliated names: Nada Marcinkova, w/f, dob [redacted] Mark L. Epstein, w/m dob [redacted] & Ghislaine N. Maxwell, uk/f, dob [redacted]. A computer query for both returned no history.

On 03/23/2005, I spoke with [redacted] cell phone wk [redacted]. I requested that she not discuss the incident with anyone including her daughter [redacted] as I did not want the investigation compromised. I was told at this time, that [redacted] and [redacted] have not been getting along due to the fact that [redacted] has decided to continue living with her father.

On 03/29/2005, I placed telephone calls to both the [redacted] and [redacted] residences requesting to speak with them regarding the

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investigation. I received return phone calls from Mrs. [redacted] and Mrs. [redacted] and advised them that I would be contacting [redacted], [redacted]s family therapist to coordinate a time to meet with [redacted]. This was at the request of both [redacted] and Mrs. [redacted] that [redacted]'s strict classroom and therapy schedule be disrupted as little as possible. I also updated them to the investigation thus far. Both [redacted] and [redacted] stated they had no objection to my meeting with [redacted]. In speaking with Ms. [redacted], she identified the cell phone number of [redacted] as being the phone assigned to [redacted] Ms. [redacted] had no objections and provided consent to giving it to the police department for the use of placing controlled phone calls from it. [redacted] stated the phone had been taken away from [redacted] as part of her punishment for not doing well in school. According to [redacted], [redacted] used to be an excellent student, but in the past two months has become irritable, verbally abusive to the family and has run away. [redacted] stated her daughter's recent behavior is the opposite of what she normally is. [redacted] stated they are going through family therapy sessions with the school but none of this had come up. Arrangements were made for Det. Captain Gudger to retrieve the cell phone from [redacted] at her place of employment.

I called [redacted], [redacted] and requested to speak with Ms. [redacted]. Upon speaking with Ms. [redacted] she advised me that she was in the middle of therapy sessions and would call me back once the sessions were completed. Ms. [redacted] stated the sessions should be concluded by 7:00 PM. At approximately 8:00PM I had called Ms. [redacted] at which time I left a message on her voice mail requesting a return phone call. I spoke with Ms. [redacted] and advised her that I did not meet with her daughter and that I would again attempt to coordinate a time with the counselor so as not to disrupt [redacted]s school schedule. [redacted] had no objections. Shortly after speaking with Ms. [redacted] I received a call from Ms. [redacted]. I explained the situation and requested a time to meet with [redacted]. [redacted] reviewed [redacted]s schedule and advised that [redacted] would be available after 3:00PM.

On 03/30/2005, I met with Ms. [redacted] and [redacted] at [redacted]. I reminded [redacted] of her conversation with Robson. During this time [redacted] initiated a conversation with me in which she admitted that she was not telling me everything that had happened during the time she was alone with Epstein. According to [redacted] while she and Epstein were alone on the second floor, Epstein used a purple vibrator to massage her vaginal area. [redacted] stated there was no penetration as the vibrator was on top of her underwear. I asked [redacted] if Epstein ever asked her age and she stated he had. [redacted] stated she told him she was eighteen. When Epstein asked what school she was in, [redacted] responded she was in the twelfth grade at Wellington. During the course of this incident, [redacted] stated Epstein told her that Haley had worked for him for years.

We then continued with the controlled call to Robson. At approximately 3:35pm [redacted], from her cell phone, made a call to Robson s home, [redacted]. Robson was not home. [redacted] was told

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that Haley Robson was at working a double and could be reached on her cell phone, [REDACTED] W/F, Haley Robson is employed at The Olive Garden Restaurant, located on Forest Hills Blvd in Wellington.

[REDACTED] called Robson. During the conversation between Haley Robson and [REDACTED], Robson asked [REDACTED] what happened, stating that she had heard rumors that [REDACTED] was going to press charges. Robson asked if they, meaning [REDACTED]'s parents, knew about Jeffery. Robson claimed to have heard that [REDACTED]'s father had found out about Jeffrey. [REDACTED] told Robson that they (her parents) did not know anything about Epstein. Robson told [REDACTED] that Epstein needed someone to work tomorrow and asked if she was available. Robson stated she would call Epstein and then call [REDACTED] back.

During the course of these conversations with [REDACTED] she would at times appear to be articulate and well spoken. She would then start to act in an immature manner, by looking around, not paying attention, drawing on a paper. [REDACTED] would offer me a high five whenever she claimed to have told me the truth in the details of the afternoon at Epstein's house. [REDACTED] would sit in the chair, with her knees propped up to her chest as she admitted that she did not tell me the all the details of her encounter with Epstein during our first meeting. As a means of positive reinforcement I would high five [REDACTED].

On 03/31/2005, subpoena requests for T-Mobile Wireless [REDACTED] and Cingular Wireless, [REDACTED]. (Robson and [REDACTED] phone numbers) were drafted.

On 04/01/2005, I met with members of PB BSF Unit for the purpose of conducting surveillance on 358 El Brillo. Cross-reference supplement.

On 04/01/2005, I met with Det. Krauel of the Palm Beach Police Department who provided me a copy of the concealed weapons permit for Mr. Epstein. It revealed Epstein had a valid permit. There was no current photo attached to the renewal notice.

On this same date I queried various different web sites for a possible identification of the purple item retrieved from the trash pull from 358 El Brillo. The item was similar in description as the one described by [REDACTED] and used by Epstein.

I made contact with Spicygear.com and spoke with the owner John. I emailed a photograph of the item for his opinion. He identified the items as a Jelly Anal Wand of some sort. The item is easily available at sex shops in South Florida.

04/06/2005, I conducted business queries into Epstein utilizing the internet. I located articles relating to financial reports. There was no local history.

On 04/01/2005 - 04/03/2005, with the assistance of BSF, there was

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continued surveillance on the property.

On 04/04/2005, I obtained a copy of voice mail messages, dated 03/31 and 04/01 from Haley Robson to [redacted] A female identifying herself as Haley states that she could pick [redacted] up to take her to Epstein's house for an eleven o'clock appointment. A copy of this was placed into evidence.

On 04/05/2005, a trash pull was conducted at 358 El Brillo by Det. Lee and me. There were several messages written on various forms of papers. There was a message from Haley, indicating [redacted] 11:00. The following was additional information obtained from trash retrieved from 358 El Brillo: Jean Luc 6:20 AM; David [redacted] Sarah Kellen [redacted] Friday 5:30PM; [redacted] Haley; a message receipt dated 4/4 1:05- [redacted]. [redacted] She is looking to speak to you .; [redacted].

On 04/06/2005, I faxed subpoena requests to SA Mighdolls office for Epstein, Robson and [redacted]s phone records. (Phone numbers [redacted], [redacted] & [redacted].

On 04/06/2005, I called [redacted] ext [redacted], and spoke with Principal [redacted] He confirmed that they had a student by the name of [redacted]. He requested a written request prior to releasing any additional information. On this same date I faxed [redacted] a request for student and parent information on [redacted] [redacted] I advised [redacted] that due to this being an open investigation he was not to discuss the matter with anyone.

On 04/08/2005, I received a message from [redacted] providing me the following information: [redacted], w/m DOB [redacted] [redacted] Wellington, Florida. [redacted] Parents name: [redacted], [redacted].

Det. Lee provided me with trash obtained from 358 El Brillo for 04/06 04/07/05. The following information was retrieved: Jet Aviation [redacted] itinerary, indicating a departure date of 04/05/2005 at 4:00 PM with an arrival in New York City of 6:15PM. Flight crew captain David Rodgers, co-captain, Larry Visoski, flight engineer Larry Morrison. Call sign N908JE; a note stating Bye J. thank you [redacted] hand written notes & messages 11-Glenn, 12:30 chicken, [redacted] 4, 3 September B & J, Big Screen x8, [redacted] work Sunday @ 4PM. [redacted] Monday after school?; left message for [redacted]; [redacted], [redacted] [redacted] [redacted] works 4-9 Monday and Tuesday, leaves school @ 11:30 AM; [redacted] will be here tomorrow @ 10:30 Am; Mrs. Business [redacted]; [redacted]. There was no trash for 04/08/05.

04/22/05 received the results of a subpoena request from Bellsouth for [redacted]. The results only provided subscriber information. I contacted Alice Grant Investigative Subpoena Compliance Center who stated the request was not complete and the results would be sent to

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me as soon as the query was finished.

Cross-referencing the names [redacted] and [redacted] as well as phone numbers, which were obtained from message notes via trash pulls, I identified the before mentioned individuals as being acquainted with someone at 358 El Brillo. [redacted] DOB [redacted] 1984, FL DL [redacted] and [redacted] DOB [redacted] 1986 FL [redacted] are both above the legal age of consent.

On 05/03/2005, I spoke with [redacted] and updated her on the investigation. [redacted] stated that [redacted] was doing well in the school. Her contact with the outside is limited as they do not have access to the phones. [redacted] comes home on the weekends and she is not allowed to go anywhere alone.

On 05/11/2005, I made arrangements to meet with [redacted] and [redacted].

On Thursday, 05/12/05, I spoke with [redacted] regarding the case. They will be moving to GA in July 2005. They will be very busy over the next few weeks but would be available via phone. Will coordinate a date to meet to discuss the matter further.

During this week I conducted surveillance at Epstein s residence and at the airport, but there was nothing to indicate that Epstein was in town.

Due to conflicting appointments, rescheduled until 06/02/2005, to meet with Ms. [redacted]

I also spoke with [redacted] and updated her to the investigation.

On 06/02/2005, I met with [redacted] and [redacted]. [redacted] advised that she could be reached via her cell phone until she is able to provide me with her new contact information.

I also received a message from [redacted]. Attempted call back but the line was busy.

June 14, 2005, I received information that Epstein's plane was at Jet Aviation. I spoke with Det. Lee regarding surveillance.

I called the Olive Garden and asked for Haley Robson. I was advised she was not working today. This would indicate that Robson was still employed there.

On 07/07/2005, I faxed subpoena requests to SA Mighdolls office for Epstein, Robson and [redacted] s phone records [redacted] (Phone numbers [redacted] and [redacted]. The original subpoena requests only provided subscriber and billing information.

On 07/20/2005, conducted a trash pull arranged by Ofc. Lee. Inside there were misc. papers with phone numbers and names. There were

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misc. female hygiene products in the trash. Based on a prior Auto Track report done on 358 El Brillo, a possible subject residing at the residence is Nada Marcinkova. Marcinkova fit the description provided by officers who had conducted surveillance in the area of a female seen entering and leaving the residence.

On 07/21/05, I received the Duces Tecum dated 07/18/05, which was clerked by ASO

On 07/26/2005, I received the results of Bell South Subpoena.

On 08/04/05, I received DHL Express from T mobile with the results of the query.

I spoke with [REDACTED] who confirmed that [REDACTED] was still living out of state. It appeared that all was going well.

I left a message for [REDACTED] at [REDACTED]

On 08/08/2005, I received the results of Cingular cell phone subpoena.

During the week of 09/08/2005, I checked 358 El Brillo and the Palm Beach International Airport but there was no direct indication that Epstein was in town.

On 09/08/2005, I reviewed the case notes of this file, as the case will be turned over to Det. Recarey.

On 09/11/2005, while on patrol, I conducted a check at Epstein's residence and found that it still had the hurricane shutters on. On a drive by the Palm Beach International Airport later that afternoon, I did not observe Epstein's plane.

On 09/14/2005, I conducted a check at the Palm Beach International Airport but did not see Epstein s plane.

On 09/19/2005, I spoke with [REDACTED] to keep her updated and to find out if there was any change of address or phone numbers for [REDACTED] I was told no. I left a message for [REDACTED] at [REDACTED] in order to provide her with Detective Recarey s information.

**************************** N A R R A T I V E # 2 ****************************
NA Reported By: RECAREY, JOSEPH 9/21/05
Entered By.: ALTOMARO, NICKIE A. 9/21/05

On September 19, 2005, I met with Officer Pagan and received the information pertaining to this case. Members of the Burglary Strike Force had previously been conducting surveillance on both Epstein and Robson. Officer Munyan was assigned to monitor the Epstein home and Sgt Sorge and Officer Minot were assigned to monitor Robson. Both teams provided a surveillance log that will be placed into the

Case No. . . . . : 1-05-000368 (Continued)
attachment file.

Det. Dawson was assigned to relieve Officer Munyan at 4:00 pm; he informed me that at approximately 8:00 pm, Epstein had left for the airport and his private jet was sitting on the tarmac. Epstein's private vehicle drove to the jet and unloaded packages into the jet. It appeared that Epstein left the county at this time. Surveillance will continue to determine when Epstein will return.

Inv Continues.

*************************** N A R R A T I V E # 3 ***************************
NA Reported By: PARKINSON, GREGORY A. 9/23/05
Entered By.: ALTOMARO, NICKIE A. 9/23/05

On Friday, September 23, 2005 at approximately 1:45 p.m., I began to copy a tape micro cassette, under case number 05-368 and property number 05-243, tape number 1. I placed the tape in the telex copy-et, series 2 machine and began to go through the copying process. Approximately 1/2 through the tape, the tape wrapped around the spindle and became locked and stretched the tape. I examined it and determined that it was in the best interest to leave it as it is as a prior copy had been made and turned over to Sergeant Frick. I immediately took the tape to Sergeant Frick and allowed him to examine it and then obtained the copy from him and Detective Recarey and brought the copy of the tape down and made a copy for him based on that. The tape was placed back in the original container and is retained in the evidence bag under the previously mentioned property number of 05-243. It is not advisable to attempt to copy this tape as further damage could result to the recorded material and there is an existing copy anyway.

*************************** N A R R A T I V E # 4 ***************************
NA Reported By: PARKINSON, GREGORY A. 9/26/05
Entered By.: ALTOMARO, NICKIE A. 9/26/05

On 3-24-05 at 11:00 pm, a copy of tape 2 (case number 05-294) had been made for Det. Pagan by Evidence Specialist Annette Badger. The copy was turned over to Detective Recarey.

On Friday, 09-23-05 at approimately 2:15 pm, I was in the process of reproducing audio tapes (micro and standard) to standard size when it was discovered, in the test review process, that tape number 2 was blank. I notified Sgt. Frick and Det. Recarey. I was informed that they had a prior copy and I could use it to make a master tape. I did so and when reviewing and signing the evidence sheet, I noticed Evidence Specialist Badger had written "#2 is blank."

I obtained that copy from Det. Recarey and made a new copy on a standard size tape. The new copy was placed in the evidence bag under

Case No. . . . : 1-05-000368 (Continued)
property number 05-294 with the blank tape.

*************************** N A R R A T I V E # 5 ***************************
NA Reported By: RECAREY, JOSEPH 9/26/05
Entered By.: ALTOMARO, NICKIE A. 9/28/05

Copies of the tapes that were submitted into evidence were requested. Additionally, trash pulls were started on September 21, 2005. Sgt. Szarszewski made telephone contact with Tony Higgins, Supervisor of the Sanitation Department, and requested that trash be collected at the Epstein House located at 358 El Brillo in Palm Beach. Sgt Szarszewski met with Sanitation worker, Jeff Williams and observed him enter the property at 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Sgt. Szarszewski who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected the bags where several notes and papers were found. These notes contained names of girls with times. Additionally, there was a note from [REDACTED] and [REDACTED] to Jeffrey Epstein on a notepad, which stated, "For a good time call [REDACTED] and [REDACTED] at [REDACTED]." Also, there was another telephone number on the note [REDACTED] Also found was a written note, which stated, [REDACTED] can not come at 7 p.m. tomorrow because of soccer. These items were written on notepads that contain Jeffrey Epstein on the bottom of the notes. These items were placed into evidence for future follow up. I requested subpoenas for subscriber information on the telephone numbers listed above on the note from [REDACTED] and [REDACTED]. The cellular telephones [REDACTED] and [REDACTED] are both assigned to Cingular Cellular Service. Other notes were found within the trash on Jeffrey Epstein pad, papers that contained telephone numbers. One note had "[REDACTED]" with [REDACTED] written on it. This cellular number is assigned to Cingular Cellular Service. Another sheet had written [REDACTED] which is assigned to Bell South Telecommunications. The subpoenas were picked up and submitted to Cingular and Bell South Telecommunication for subscriber information.

On September 22, 2005, I was informed by Sgt. Szarszewski that there would be no trash pick up as it was recycle pick up day. A request for copies of the micro and standard size cassettes were requested from crime scene to familiarize myself with the interviews conducted.

On September 23, 2005, the tapes were received and I began to become familiar with the interviews that were conducted. Det. Krauel had met with Town of Palm Beach Sanitation worker, Jeff Williams and observed him enter the property of 358 El Brillo. Shortly thereafter, Williams exited the property and placed the three white trash bags in the empty well in the rear of the truck. Williams then drove away where he met with Det. Krauel who removed the bags from the well and placed them into one large black trash bag. The bag was returned to the Police Station where I was waiting for him. Upon his arrival, we inspected

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the bags where several notes and papers were found. The notes will be inspected for future use. The items collected were placed into evidence.

It became evident that some of the recordings were recorded with background noise and some interference. The calls most affected were the control phone calls from the victim to the suspect Haley Robson. I obtained the graphic equalizer and discovered that the calls are able to be legible with the use of the equalizer by lowering the background noise and increasing voice gain. I also learned that a tape was broken during the coping of the tape. I returned the copy of the tape marked Property Number 05-243 to have it recopied to have an original in evidence and a working copy with the file.

Upon researching the file, it was discovered that the suspect, Haley Robson's cellular calls were subpoenaed incorrectly. The suspect telephone number was [REDACTED] and the original request was for [REDACTED]. I requested the information through Cingular Cellular Service from February 2005 through the present. The purpose was to have a record of Robson making calls to victim, Jeffrey Epstein and the frequency of calls. The request was submitted to the State Attorney's Office.

Investigation Continues....

**************************** N A R R A T I V E # 6 ****************************
NA Reported By: KRAUEL, CURTIS D. 10/06/05
Entered By.: ALTOMARO, NICKIE A. 10/06/05

On or about September 23, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. Williams had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 4 white in color plastic bags and each contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about September 26, 2005 at approximately 0900 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jessie Jones. Jones had been previously notified to assist in trash pulls at the residence of Jeffrey Epstein, 358 El Brillo, Palm Beach, Florida. I observed Jones enter the driveway of 358 El Brillo, where no trash was located within the receptacles. I left the area without incident

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and notified Det. Recarey to that affect.

On or about September 27, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jesse Jones. I observed Jones enter the driveway of 358 El Brillo and remove one plastic bag of trash and place it in the back of an empty sanitation truck.

I then followed Jones to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 1 white in color plastic bag which contained correspondence for 358 El Brillo. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Monday October 3, 2005 at approximately 0915 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the back of an empty sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 7 white in color plastic bags with a red tie and 1 black in color bag which contained 2 white in color plastic bags with a red tie. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. Inside of one of the white in color bags, I located a broken piece of a hard plastic or clear acrylic stick, which was shaped with small ridges. This device is commonly used as a sexual toy which is inserted into the vagina or anus for stimulation. This item, along with all documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Tuesday October 4, 2005 at approximately 0928 hours, I responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the side well of the sanitation truck. This side of the truck is separate from the rear of the truck and does not come into contact with other trash.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents. There was a total of 2 white in color plastic bags which were tied at the top. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

On or about Wednesday October 5, 2005 at approximately 0928 hours, I

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responded to 358 El Brillo and met with PB Sanitation worker Jeff Williams. I observed Williams enter the driveway of 358 El Brillo and remove several plastic bags of trash and place the contents into the bed of the sanitation truck.

I then followed Williams to a predetermined location and seized the trash from the truck. The trash was transported to the Palm Beach Police Department where I began sifting through its contents, with the assistance of Det. Recarey. There were a total of 2 bags, one of which was white in color and tied in a knot at the top, and the other was a black in color bag, which contained two white in color trash bags along with loose debris. Each of the bags contained documentation and correspondence for 358 El Brillo and Jeffrey Epstein. All documents of evidentiary value were removed and turned over to Det. Recarey for follow-up.

**************************** N A R R A T I V E # 7 ****************************
NA Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

I met with Det. Krauel and requested further assistance to maintain trash collections at Epstein's residence at 358 El Brillo Road. On October 3, 2005, at approximately 10:30 am, I was contacted by Sgt. Frick to respond to the Palm Beach Police Station. Det. Krauel had observed Jeff Epstein riding his bicycle on South County Road. Upon my arrival, I met with Sgt Frick who advised, as Epstein was currently in Town; we interview [redacted] as to her involvement with Epstein and the girls that are brought to his house. As we were to interview [redacted] in the county, (outside of our jurisdiction), I contacted the State Attorney s Office Investigation Division, and made contact with Assistant Supervisor Investigator Carlos Ortiz. I requested assistance to interview [redacted] as the interview may occur in the county. Supervisor Ortiz assigned Investigator Mike Waites to assist us at the location and interview of [redacted].

Det. Dicks had responded to the address of [redacted] and viewed her vehicle parked in the driveway. [redacted]s vehicle a red Plymouth Neon baring [redacted] was parked in the driveway of [redacted] [redacted] in Loxahatchee. Sgt Frick and I responded to 120th Ave and awaited the arrival of Investigator Mike Waites. Upon his arrival, he was briefed that should she wish to be interviewed within her home he would be needed. However, should [redacted] agree to return to the police station for further questioning, he would not be needed. Sgt. Frick and I knocked on the door and met with [redacted]. [redacted] was told that we were investigating a claim involving Jeffrey Epstein of El Brillo in Palm Beach. [redacted] was asked if she wanted to accompany us back to the police station for further questioning. She was also told that at the conclusion of the interview she would be returned home. She agreed and wished to change her clothes prior to accompanying us back to the police station. At the conclusion of her changing clothes, she advised she was ready to go. I thanked Inv. Waites and advised she was going to voluntarily return to the police station.

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Upon [REDACTED]s entry in the unmarked Detective vehicle, I placed a tape recorder within the vehicle to record any conversations within the vehicle. During the ride back to the police station, [REDACTED] advised she is attending Palm Beach Community College at the Palm Beach Gardens Campus and is majoring in journalism.

Upon our arrival at the police station, [REDACTED] was brought to the interview room in the Detective Bureau. I explained to [REDACTED] that I appreciated her willingness to assist us and informed her that should she desire to leave at any time she may do so. I further explained the interview room door is only closed for privacy. [REDACTED] stated she understood. During the taped sworn interview, [REDACTED] was asked how she came in contact with Epstein. [REDACTED] stated back when she turned 17 years of age she was approached by a friend [REDACTED] in the Canopy Beach Resort in Rivera Beach. [REDACTED] was asked if she wanted to make money.

She was told she would have to provide a massage and should make $200.00. [REDACTED] thought about the offer and agreed to meet with Jeffrey. [REDACTED] (Unknown last name) and [REDACTED] (Unknown last name) picked her up and she was taken to Epstein's house. Upon her arrival at the house, she was introduced to Epstein in the kitchen of the house. She was also introduced to a white female known to her as Sara. She was led upstairs to the main bedroom known to her as Jeff Epstein s bedroom. Sara arranged the massage table and covered the table with a sheet. She brought out the massage oils and laid them next to the massage bed. Sara then left the room and informed her Jeff would be in a minute. Jeff entered the bedroom wearing only a towel. He lay on the table onto his stomach and picked massage oil for [REDACTED] to rub on him. During the massage, [REDACTED] stated, He tried to touch me and I stopped him. I asked how he tried to touch her. He grabbed her buttocks and she felt uncomfortable. [REDACTED] also stated Epstein has a vibrator, which is large and white in color. [REDACTED] told Epstein, I'll massage you but I don't want to be touched. [REDACTED] stated she performed the massage naked. At the conclusion of the massage, Epstein paid [REDACTED] $200.00 for the massage. He explained, I know you re not comfortable, but I'll pay you if you bring some girls. He told her the younger the better. [REDACTED] stated she once tried to bring a 23-year-old female and Epstein stated that the female was too old. [REDACTED] was asked how many girls she brought in total to Epstein. [REDACTED] stated six that she can remember. [REDACTED] stated she brought [REDACTED] [REDACTED] and the victim in this case.

I asked [REDACTED] which one was the youngest. [REDACTED] advised the victim was the youngest. [REDACTED] stated every girl she brought knew what to expect when they arrived. They were told they would provide a massage, possibly naked, and some touching. I asked her if the victim was aware. She stated every girl she brought knew what to expect. She explained she knew the victim wanted to make money. She approached the victim and explained about going to work for Jeff. The

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victim agreed and arrangements were made to bring the victim to Epstein's house on a weekend. [redacted] stated that she and [redacted] (later identified as [redacted] picked up the victim at the victim s house. They traveled to Epstein's House and entered through the kitchen door. They met with the house chef and Epstein s assistant Sara. The victim was introduced to Epstein while they were in the kitchen area. Sara led the victim upstairs and Epstein went upstairs. When the massage was over, the victim returned to the kitchen area. [redacted] stated she was paid $200.00 for bring the victim to Epstein's. [redacted] stated the victim told her she was paid $300.00 for the massage. Back in the vehicle, [redacted] asked the victim what happened. The victim told her about the massage and then they went shopping. [redacted] stated the victim was the last person she brought to Epstein. She further stated that she had changed her cellular number to avoid being contacted by Sara. She continued that when Epstein announces to his assistant that he is traveling to Palm Beach, Sara would contact [redacted] to arrange girls for Epstein. Sarah, later identified as Sarah Kellen Date of Birth [redacted] had told [redacted] that Jeff likes to have his fun with the girls.

[redacted] stated that once her parents discovered that she was visiting Epstein, they disapproved of the encounters with him and she stopped. [redacted] further stated that Sara still tries to call the house and leaves messages. With the assistance of [redacted] we were able to identify [redacted] DOB [redacted]1987, [redacted] DOB [redacted]1987, [redacted] DOB [redacted]1988, and [redacted] DOB [redacted]1988.

Sgt Frick entered the room and explained that based on her own statements, she had implicated herself with bringing underage girls to Epstein's house. [redacted] was aware of what she had stated and wished to assist further in hopes to receive a lesser charge. [redacted] provided cellular telephone numbers for the girls she had mentioned previously. Additionally, she also provided possible addresses and areas in which they lived. As [redacted] was being taken home in the vehicle, a tape recorder was placed within the vehicle to record any conversations within the vehicle. During the drive back to her home, [redacted] made the comment I m like a Heidi Fliess. (Hollywood Madam who sent girls to clients for sexual favors in California). [redacted] was dropped off at her house without incident.

Sgt Frick and I went to [redacted] Loxahatchee, Florida in an attempt to speak with [redacted]. We met with Mrs. [redacted] ([redacted]s Mother) at the front door. We explained the ongoing investigation and felt that [redacted] may have additional information as we had information that she had worked for Jeff. Mrs. [redacted] introduced us to her husband and allowed us entry into the home. We sat in the dinning room and met with [redacted] [redacted]1988. As she was under the age of eighteen, Mrs. [redacted] was advised we would be speaking with her. She expressed, if her daughter had information she wanted to assist. As we interviewed [redacted] she denied having any inappropriate encounters with Jeff (Epstein). She stated she had gone to Jeff s

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House with Haley Robson approximately eight months ago and sat in the kitchen with the house chef but nothing happened. As the parents were present during the interview, we felt that [REDACTED] was withholding information from us. She made several comments as to she has put the entire incident behind her. I left my direct telephone number and advised should she wish to speak with me again to telephone me. Sgt Frick and I thanked Mrs. [REDACTED] for her time and left the area. She stated she would ask her again after we left as to what happened at Epstein s house. I informed her that [REDACTED] had my telephone number and hopefully she would call.

Sgt Frick and I then attempted contact with [REDACTED] at [REDACTED] in Loxahatchee. We met with [REDACTED] who stated [REDACTED] was her daughter. [REDACTED] was at the Wellington Mall and was not home. We explained the ongoing investigation and felt the [REDACTED] may have additional information as we had information that she had worked for Jeff. We left our phone numbers and asked her to telephone me upon her daughter's return. We then left the area.

On October 4, 2005, at approximately 8:05 am, Sgt Frick had retrieved a voice mail message from [REDACTED]. She stated she had spoken with her daughter and she had information as to what occurred at Jeff s house. I contacted [REDACTED] who stated her daughter was in the shower at the moment and would be traveling back to Orlando to attend College. I informed her I would be en route to her home in Loxahatchee. Det. Dawson and I drove to the [REDACTED] home and met with [REDACTED] and [REDACTED]. During a sworn taped statement, [REDACTED] stated she was taken to the house by Haley Robson. She was told she could make money working for Jeff. She was told she would have to provide a massage to Jeff. [REDACTED] stated upon her arrival to the house she was brought to the kitchen area by Robson.

They met with the house chef and Haley stayed in the kitchen. She was introduced to Sara, Jeff's assistant and was brought upstairs to the mater bedroom. Sara prepared the room and massage table for a massage. Epstein entered the room and she provided a massage. [REDACTED] stated she kept her clothes on during the massage. She stated sometime during the massage Epstein grabbed her buttocks and pulled her close to him. [REDACTED] said she was wierded out by the incident involving Jeff. At the conclusion of the massage, she was paid $200.00 for the massage. I asked [REDACTED] if she has any formal training in massages to which she replied no. I asked her if Robson received any monies for taking her to perform the massage. [REDACTED] stated Robson also received money for taking her there. [REDACTED] stated she went with Robson and another girl, [REDACTED] to Jeff's house once. [REDACTED] stated she waited in the kitchen with Robson, while [REDACTED] was taken upstairs by Sara. [REDACTED] stated she only did the massage once, as she was wierded out by the whole experience. At the conclusion of the interview and the tape was stopped, I was informed that Sara had attempted to reach [REDACTED] via cell phone. A voice mail message on October 4, 2005 at 10:59 am, revealed a female voice who identified herself as Sara who requested her to call her back reference the

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police questioning. This voice mail message was recorded onto a micro cassette. [redacted] provided the incoming telephone number as [redacted]. [redacted] stated she inadvertently told [redacted] about the police investigation because [redacted] had called her to tell her about how she just received a rental car from Jeff Epstein. [redacted] had called her to tell her that she was given a rental car, a 2005 Silver Nissan Sentra, to utilize to visit family and visit Jeff. [redacted] asked her what was going on at the house that the police would be asking questions. [redacted] stated [redacted] then called Jeff and Sara and asked what was going on reference the ongoing police investigation. According to [redacted], Sara has since then been trying to contact her to ask about the police questions. I instructed [redacted] not to contact Sara and do not provide any more information to [redacted] as she would notify Jeff Epstein and Sara what was transpiring.

Investigation Continues...

**************************** N A R R A T I V E # 8 ****************************

NA Reported By: LEE, LA'MONT 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/07/05

On March 30, 2005, I was asked by Sgt. Daniel Szarszewski to begin conducting surveillance and trash pulls reference Detective Pagan conducting a criminal investigation involving Jeffrey Epstein. I was advised that Epstein was possibly engaging in sexual contact with young females.

On March 30, 2005, I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on March 31, 2005.

On March 31, 2005 at 9:20 a.m., I responded to the area of 358 El Brillo Way and met with Town of Palm Beach sanitation employee, Jeffrey Williams. I observed Williams enter the driveway of 358 El Brillo Way, collect the trash bags from Epstein's property and place the contents into an empty sanitation truck. I followed Williams to a nearby area, were he turned over seventeen white plastic trash bags, which were collected from Epstein's property.

I took the trash bags to the sanitation department were I sifted through its contents. I collected mail correspondence from Armani Exchange addressed to Nada Marcinkova, Jeffrey E. Epstein notepaper with [redacted], an important message notepaper addressed to J.E dated 03/29/05 at 8:15 p.m. reference [redacted], U.S Airways boarding pass copy for passenger, Janusz Banasiak, Montgomery County, Maryland Health Department food service ID [redacted] for Janusz Banasiak and Ghislaine Maxwell notepaper with names and phone numbers. Photocopies of the trash collected were attached with the supplement. Detective Pagan was advised of the contents that were collected for evidentiary value.

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On March 31, 2005, Sgt. Daniel Szarszewski requested that I set up a surveillance vehicle on El Brillo Way and conduct video surveillance of the front exterior of Epstein's residence. At 3:00 p.m., I set up a surveillance vehicle equipped with a video monitoring device. The surveillance vehicle was parked on El Brillo Way approximately fifty feet east of Epstein's driveway. The purpose of the video surveillance was to gather investigative intelligence by monitoring and recording all vehicle and pedestrian traffic entering and leaving Epstein's property.

The video surveillance tapes were changed daily with a new Maxell T-160 VHS tape. Video surveillance was established for Epstein s from March 31, 2005 through April 05, 2005. On April 05, 2005, video surveillance was concluded. I reviewed the video tapes and advised Detective Pagan the surveillance videos yielded no evidentiary value.

On April 01, 2005 at 9:30 a.m., I responded to the area of 358 El Brillo Way to meet with Town of Palm Beach sanitation employee, Jessie Jones. While parked in the area of 358 El Brillo Way waiting to collect Epstein s trash, I observed a white female, who I recognized as Nada Marcinkova from her Florida driver's license photograph. I made no contact with Marcinkova. While parked in the area, I also observed Epstein s GMC Yukon truck leave the property as well as other vehicles arrive and park across the street from the property. The occupants of these vehicles appeared to be housekeepers, maintenance men, and gardeners.

At 9:38 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein, automotive records and personal documents for Janusz Banasiak and Beata Banasiak as well as Jeffrey Epstein notepaper with the names and appointment times for [REDACTED] and [REDACTED]. No last names or other personal information was written on the notepaper.

While sifting through Epstein s trash, I also collected a three-inch purple finger size object, which had a broken end. The object appeared to be a broke piece from a sexual toy similar to a (Cyclone Vibrator) possibly used for rectal gratification. The sexual object was photographed for Detective Pagan, packaged in a biohazard evidence bag (possible body fluids) and secured as investigative evidence. All items collected from Epstein s trash were turned over to Detective Pagan for evidentiary purposes.

On April 05, 2005 at 9:18 a.m., I met with Town of Palm Beach sanitation employee, Jessie Jones. I observed Jones enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed Jessie to a predetermined area at which time I

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collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. I collected mail correspondences addressed to Jeffrey Epstein as well as notepaper (Important Message) with names and telephone numbers. The following are items collected from Epstein s trash.

[REDACTED] [REDACTED]
blank piece of white paper [REDACTED]
black paper [REDACTED]
black paper [REDACTED]
David [REDACTED]
MSN Hotmail web page with email address [REDACTED]com)

The following items were documented for Detective Pagan s investigation for evidentiary purposes.

On April 06, 08, 11, 12, 13, 15, 2005, at approximately 9:30 a.m, I met with Town of Palm Beach sanitation employees. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein's property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents.

All of the documents collected from Epstein's trash during my assistance were turned over to Detective Pagan for evidentiary purposes.

On June 14, 2005, Detective Michelle Pagan contacted me and advised that the airplane belonging to Jeffrey Epstein of 358 El Brillo Way was parked at the Palm Beach International Airport.

Detective Pagan requested that I begin trash pulls for the purpose of gathering evidence and intelligence.

I made contact with Town of Palm Beach Sanitation Office Supervisor Tony Higgins and requested trash pulls for 358 El Brillo Way to begin on June 15, 2005.

On June 15, 2005, I met with a sanitation employee. I observed the employee enter the driveway of 358 El Brillo Way and collect the trash from Epstein s property. I followed the employee to a predetermined area at which time I collected the trash bags from the sanitation truck. I transported the trash bags to the sanitation department, where I sifted through its contents. The trash yielded negative results and no evidence was collected.

No further trash was collected throughout the week due to the fact that Epstein s security gates remained closed throughout the week; therefore, the sanitation employees were unable to gain access onto the property for collection of the trash.

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All evidence and intelligence gathered by this officer has been turned over to the detective bureau and no further action has been taken by this officer.

End of supplement.

*************************** N A R R A T I V E # 9 ***************************
NA
Reported By: RECAREY, JOSEPH 10/07/05
Entered By.: ALTOMARO, NICKIE A. 10/10/05

On October 4, 2005, I made telephone contact with [redacted] who had left several messages on voice mail. During the message, she advised she was not completely truthful when we met in person but would like to speak with me to advise what had happened. She further advised she did not want to speak of this incident in front of her mother. At approximately 15:48 pm, I made telephone contact with [redacted] at [redacted] During a taped recorded statement, [redacted] stated the following: Approximately a year ago, when she was sixteen years of age, Robson took her to Jeff's house twice. The first time she went, Haley Robson drove to the house. They entered through the kitchen area where she was introduced to Sara and Jeff. She was taken upstairs to a bedroom by Sara who set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to remove her shirt at which point she became very upset and discontinued the massage. Both [redacted] and Jeffrey had a verbal disagreement at which time she left without being paid. She met with Haley Robson who was sitting in the kitchen and told her let's go. [redacted] advised she received no money for that day. [redacted] also said that Haley Robson had told her if she was uncomfortable with what was going on, to let him know and he'll stop. She knew that the more you do the more you are paid.

Several weeks later, [redacted] advised she agreed to be taken a second time by Haley Robson. Once they arrived at the residence, Haley sat in the kitchen and Sara took her upstairs to the master bedroom again. Sara set the room up with a massage bed and brought out the oils to use. Jeff then entered the room wearing a towel. He lay on the table and picked out a lotion for [redacted] to rub on him. At one point during the massage, he tried to touch her buttocks. As [redacted] was wearing tight jeans and had a tight belt on Jeff was unable to touch her buttocks. Jeff then rolled onto his back during the massage; he attempted to touch her breasts. [redacted] then became upset again and told him she didn't want to be touched. [redacted] discontinued the massage and was paid $200.00. [redacted] then went downstairs where Haley Robson was waiting for her. She told Robson she wanted to leave. [redacted] said she never returned to the house. [redacted] stated she is aware that her friend, [redacted] was also at the house and had a problem with Jeff. She provided a telephone number

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for ████ The interview was concluded and the micro cassettes were turn in as evidence.

On October 5, 2005, I researched the incoming telephone number that had left ████ a message. The telephone number, ████, was assigned to ATT/Cingular Cellular service. I prepared a subpoena request and faxed the request to the State Attorney s Office. Information requested was subscriber information as well as all incoming and outgoing calls for the months of September and October 2005.

I later researched ████ and discovered she resides in Royal Palm Beach. Det. Dawson and I drove to Royal Palm Beach and met with ████ at her residence ████ in Royal Palm Beach.

████ agreed to speak with us in the kitchen area. During a sworn taped statement, ████ stated the following: On or about November 2004, she was approached by Haley Robson and asked if she wanted to make money. She agreed and was told she would provide a massage to wealthy man in Palm Beach. Robson picked her up and drove her to a house in Palm Beach. She was brought into the kitchen area of the house. She further stated that ████ and ████ went with them. They were brought into the kitchen where she was introduced to Jeff and other females. ████ stated she was introduced to a helper of Jeff; the female was described as white female (unknown name), with blond hair. She stated that the assistant was familiar with Robson. The assistant set up the massage table and put out lotions to be used. She told ████ Jeff would available in a minute. Jeff entered the room wearing only a towel. Jeff lay on the massage table and picked a lotion to rub on his thighs and back. ████ further stated that during the massage Jeff asked her to remove her clothes. She complied and removed her pants and blouse. ████ didn't remember if she had removed her bra but feels that she did. ████ was certain that she stayed in her thong underwear. ████ continued the massage and at one point she straddled him to massage his back, which touched his buttocks with hers. ████ was instructed to return to the ground at which time Jeff turned to have his chest rubbed. ████ advised it was at this time she is sure he was masturbating. ████ did not want to look at his penis area because she was uncomfortable. Jeff removed a large white vibrator and turned it on. ████ stated he began rubbing the vibrator over her thong underwear on her vaginal area. Shortly thereafter, Jeff ejaculated and removed himself from the table. He walked over to where the shower was and opened the glass door. She waited as he was taking a shower in her direct view. When I asked ████ how old she was when this occurred, she stated she had just turned seventeen. At the conclusion of the shower, ████ was paid either $350.00 or $400.00. She stated she wasn't sure, but knows it was close to $400.00. At the conclusion of the interview, ████ stated she never returned to provide a massage for Jeff. She advised she was ashamed and uncomfortable with the situation.

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Det. Dawson and I then left the area and responded to the [redacted] High School where Robson and all the above-mentioned girls had attended. I met with School Police Officer, Off Williams. I explained I was looking for a previous student who attended [redacted] High School. I inquired about [redacted] I further explained that I was working a case in which most of the girls I have interviewed are either witnesses or victims and felt that [redacted] may be one as well. Officer Williams researched his previous student records and found [redacted] She attended the same year and graduated in the same year as the other girls. I was provided the last known address of [redacted]

At approximately 2:10 pm, Det. Dawson and I met with [redacted] at her residence, [redacted] in Royal Palm Beach. As [redacted] was only seventeen years of age, I had notified her mother, Mrs. [redacted] that she would be interviewed reference an ongoing investigation in Palm Beach. I assured her that her daughter was not a suspect. I explained the possibility of her being either a witness or victim. Mrs. [redacted] advised she wanted [redacted] to cooperate and consented to the interview. During a sworn taped statement, [redacted] stated the following: at the age of sixteen, during the month of September 2004, she was approached by Haley Robson for a chance to make money. [redacted] was friends with the friends of Robson and knew the same people. [redacted] had been previously told by her friends what Robson did for Jeff. Robson called a person known to [redacted] as Sara and scheduled the appointment. Robson picked [redacted] up and drove her to Palm Beach to a street called Brillo Way. They drove to the end of the street and entered a large driveway. They entered the kitchen area of the house and met with Jeff. [redacted] was introduced to Jeff. Robson led [redacted] upstairs to the main bedroom area and set up the room with a massage table and set out the oils. Robson dimmed the lights and turned on soft music. Robson exited the room and Jeff entered the room wearing only a towel. Jeff picked oils and instructed her to rub his legs, under his buttocks, back and chest area. Jeff asked her to get comfortable. [redacted] advised she did not remove her clothes. She was wearing tight jeans and a cropped tank top exposing her belly area. During the massage, Jeff removed his towel. As [redacted] rubbed his chest area, Jeff attempted to reach down her pants through the buttocks area, however was unable to due to the tightness of the jeans and a tight belt. [redacted] advised Jeff began to masturbate as she rubbed his chest. Jeff moaned as she rubbed his chest. She observed he was continuing to masturbate and attempted to reach up her tank top and touch her breasts. [redacted] pulled back and Jeff stopped. However, he kept masturbating until he climaxed. He cleaned himself with the towel he was previously wearing. I asked [redacted] if she knew the difference between circumcised and not circumcised. She explained she knew and advised Jeff was circumcised. [redacted] was paid $200.00 for the massage and left the area. She met with Robson who was waiting in the kitchen area and left the house.

[redacted] then explained she never provided another massage for Jeff. She did however, go to the house with Robson and [redacted] as they

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took another friend of Robson's. [redacted] advised she was present when [redacted] went to work for Jeff. She advised she rode over and sat in the kitchen area with Robson to wait for [redacted] [redacted] advised that while they waited for [redacted] the house chef prepared lunch for them, as it was almost lunchtime. As [redacted] was finished with the massage, they left the area. I asked [redacted] if Robson ever told what would be expected of her when she provided a massage. [redacted] stated yes, Robson told her that a massage would be expected possibly naked and possibly some touching involved. [redacted] has no formal training in providing massages.

[redacted] spoke about a third and last time she went to Jeff's house. Robson drove another girl, [redacted] who is [redacted]s friend, to Jeff's house. [redacted] stated she knew that Robson had made money providing girls for Jeff and she wanted to do the same. Robson took them in the kitchen area of the house and introduced [redacted] to Sara. Robson and Sara took [redacted] upstairs to the main bedroom. [redacted] advised she doesn t know what happened as [redacted] did not speak about what happened in the room. [redacted] received $100.00 from Robson for going with her to Jeff s house and recommending [redacted] [redacted] was unable to remember [redacted]s telephone number. The interview was concluded and we left the area.

Investigation Continues...

*************************** N A R R A T I V E # 10 **************************

NA Reported By: RECAREY, JOSEPH 10/09/05
Entered By.: ALTOMARO, NICKIE A. 10/10/05

On October 6, 2005, Det. Dawson and I went to Lynn University located in Boca Raton. We met with Dean of Students, Paul Turner. I explained to Mr. Turner that we were investigating a crime within the Town of Palm Beach and felt that a student, [redacted] may have information. Turner confirmed that [redacted] is a student and currently on the soccer team for Lynn University. She was in computer class at the time of our arrival. Turner sent a security guard to locate [redacted] in class and bring her to the office. Mr. Turner allowed us to interview [redacted] in an empty conference room.

At 11:45 am I met with [redacted] and explained to her why we there to interview her. She advised she was aware of the ongoing investigation. [redacted] stated she had previously spoken with [redacted] [redacted] who told her she was interviewed by detectives. During a sworn taped statement, [redacted] stated she knew that Haley Robson worked for Jeff in Palm Beach. [redacted] advised she has been there many times for massages. I asked her if she had formal training in providing massages, [redacted] stated she did not. [redacted] advised she was told what was expected of her by providing massages and would have to remove clothing but if she felt uncomfortable just to say so and Jeff would stop pushing the issue. [redacted] began providing massages and advised she kept her clothes on. She considered Jeff a pervert who kept

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pushing to go further and further. [REDACTED] explained she would keep telling him she had a boyfriend and that it would not be right to her boyfriend. It wasn t until recently [REDACTED] admitted to removing her clothes and staying in her thong underwear to provide a massage. [REDACTED] explained Jeff wanted to be rubbed on his back and recently he began turning over to have her rub his chest as he masturbated. He would try to touch her breasts as she rubbed his chest. [REDACTED] stated, Jeff would try to get away with more and more on each massage. Originally, Robson drove her to the house for the original massage. [REDACTED] left Sara her cell phone number and every time Jeff would come into town, Sara would call her for an appointment. Each time she went, Sara would meet her at the kitchen door area. She would bring her upstairs and prepare the massage table. [REDACTED] advised Jeff would ask her questions about herself. He knew she was a soccer player and would be attending Lynn University. I asked [REDACTED] if he knew her real age, [REDACTED] stated Jeff didn t care. The most recent massage she provided was on October 1, 2005. During the massage she asked Jeff if she could borrow one of his vehicles to visit her family and boyfriend in Orlando. Jeff had told she could borrow one of his vehicles but later stated he would rent her a car. She continued with the massage as Jeff grabbed her buttocks and caressed the buttocks cheeks. I asked [REDACTED] if she was wearing undergarments to which she replied her thong underwear. Once he tried to touch her breasts she would pull away from him and he would stop. [REDACTED] was asked if he ever used a vibrator on her. [REDACTED] was aware of the vibrator but advised she never would allow him to use the vibrator on her. She described the vibrator as a large white vibrator with a huge head on the tip of the vibrator. She stated he kept the vibrator in a closet near the massage table. [REDACTED] advised she had been doing the massage for approximately two years, which meant she would have started doing massages for Jeff at the age of sixteen.

[REDACTED] stated she was contacted by Sara on October 3, 2005. Sara had informed her that Jeff had rented her a new Nissan Sentra and she should come by the house to pick it up. Sara informed [REDACTED] she would have the car for a month. [REDACTED] stated Jeff knew her car was not working properly and had missed appointments in the past because of her car being inoperable. [REDACTED] explained the car is currently parked next to the Gym field. I asked her if she ever took any one to the house. [REDACTED] explained she took [REDACTED] a friend of hers who has returned to Orlando to attend college. I asked she ever allowed another female in the room. [REDACTED] advised no one was brought into the room with her. At the conclusion of the interview, Det. Dawson and I went to the Gym area and located the Silver Nissan Sentra bearing Florida tag X98-APM. The vehicle is registered to Dollar rent a car out of the Palm Beach International Airport.

Telephone contact was made with [REDACTED] the victim's mother, at [REDACTED] I explained to her that I was following up on this case and provided a complete update on the case.

Investigation Continues.

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**************************** N A R R A T I V E # 11 **************************
NA Reported By: RECAREY, JOSEPH 10/21/05
Entered By.: ALTOMARO, NICKIE A. 10/21/05

On October 10, 2005, at approximately 2:30 p.m., I made telephone contact with [redacted] During a taped conversation, [redacted] was told of an ongoing investigation in which I felt she had information pertaining to Jeffrey Epstein. [redacted] explained she met Epstein when she was just sixteen years of age. She was approached by [redacted] [redacted], a friend who also had previously gone to Epstein's house for massages. [redacted] advised she was working at the Wellington Mall when she was approached. [redacted] told her that she would have to provide a massage to Epstein and she would have to perform this massage naked. [redacted] thought about the offer and stated she could make $200.00 for only 30 minutes of work. She agreed to perform the massage and [redacted] set the appointment for her that same day. [redacted] remembered it was a weekend as she only worked at the mall on the weekends. [redacted] took her to the house where she was introduced to Sara, Jeff Epstein's assistant. Sara took her upstairs to a master bedroom. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom where Sara prepared the room by setting up the massage table and provided the oils for her to rub on Epstein.

Epstein entered the room and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] could not remember if he was naked or if he entered the room with a towel. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. I asked [redacted] if she knew what circumcised and un-circumcised meant. [redacted] stated circumcised is when the penis has no foreskin and the head of the penis is visible. [redacted] said Epstein is circumcised. [redacted] began to cry on the telephone and stated she had been to his house hundreds of times over a two-year period. She claimed to have made thousands of dollars during her visits. [redacted] stated she could not remember how many times exactly she went to Epstein's home but said it was a lot.

[redacted] became more upset, crying hysterically and stated she was paid and instructed to have sex with Epstein's assistant, Nada Marcinkova by Epstein. Epstein continued to watch them have sex and masturbated himself as they had sex with each other. She further stated that things escalated further and further. Epstein used sexual toys such as vibrators, rubber penises and strap-on penises on [redacted]. Additionally, [redacted] stated he performed oral sex on her numerous times. She claimed he (Epstein) put his fingers inside her vagina while he masturbated in an attempt to make her climax. [redacted] could not continue and wanted some time to regain her composure. I explained to [redacted] to take her time. After taking several minutes to regain her composure I

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explained that I would travel to meet with her in person as I felt she had additional information to provide. I met with Sgt. Frick and explained the importance to meet with [redacted] in person. Sgt. Frick agreed and made arraignments for Det. Dawson and I to meet with [redacted] in Jacksonville, Florida.

On October 11, 2005, at 4:10 p.m., Det. Dawson and I met with [redacted] and her friend, [redacted] at [redacted] in Jacksonville, Florida. [redacted] wanted to have [redacted] present for support. I explained to her that I did not have a problem as long as she wanted [redacted] present during the interview. [redacted] stated she wanted her present. I explained that as [redacted] was present she was not allowed to comment or ask any questions during the interview. She was only there to comfort [redacted] should the interview upset her.

During a sworn taped statement, [redacted] explained how everything began. She said she was brought through the kitchen area where she met Sara for the first time. She was led to the master bedroom, Epstein s room. [redacted] explained that as she was walking up the stairs she observed several photographs of naked women along the walls and tables of the house. [redacted] further explained that she was brought into the bedroom, where Sara prepared the room by setting up the massage table and provided the oils for her to rub on Epstein. [redacted] explained she remembered the steam room area, which contained two large showers. Epstein entered the room from the steam room area and introduced himself. Epstein lay on the table and told her to get comfortable. [redacted] removed her skirt and kept her shirt on. She could not remember if he was naked or if he entered the room with a towel. Epstein then instructed her to remove her shirt. [redacted] removed her shirt and remembered she was not wearing a bra. [redacted] stated she provided the massage wearing only her panties. She continued rubbing his legs, thighs and feet. [redacted] advised he turned over onto his back. She continued to rub his legs with the oils. Epstein touched her breasts and began to masturbate. Epstein ejaculated which meant the massage was over. At the conclusion of the massage, [redacted] was paid $?00.00. They walked together downstairs where Sara and [redacted] were waiting. [redacted] stated [redacted] received an unknown amount of money for taking her to Epstein. Epstein instructed to leave her cellular telephone number so that he could contact her when he is in town.

[redacted] explained that she continued to go to Epstein s house and became a regular at the house. She could not provide an exact number but claimed she had been their hundreds of times. She claimed sexual activities did not occur every time she was there. There were times she went to dinners and parties with Epstein. [redacted] explained that things began to escalate more than the massage. The encounters included bringing in his assistant, Nada Marcinkova. [redacted] explained Epstein had purchased her from her family in Yugoslavia. Epstein bragged he brought her into the United States to be his Yugoslavian sex slave. [redacted] advised he was naked in the bedroom, she entered and removed her clothing. Marcinkova entered the room from the steam room area already naked. He instructed [redacted] to perform oral sex on

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Marcinkova . [redacted] refused to perform that act. Epstein offered her an additional $200.00 for her to perform oral sex on Marcinkova for five minutes. [redacted] agreed to perform the oral sex for the additional $200.00. [redacted] explained that Epstein would masturbate while he watched them perform sexual acts.

Things continued to escalate by purchasing sex toys. [redacted] stated she had massagers, vibrators and strap on rubber penises used on her. Each time something new was introduced additional monies were produced and offered for [redacted] to allow the acts to happen. [redacted] was adamant that she performs all these acts but there was an understanding with Epstein that no vaginal penetration would occur with his penis. [redacted] explained that Epstein's penis was deformed. [redacted] explained that his penis was oval shaped. She claimed when Epstein's penis was erect, it was thick toward the bottom but was thin and small toward the head portion. She called it egg-shaped.

[redacted] continued that the sexual encounters with Marcinkova, Epstein and her became a ritual. [redacted] would arrive at the house and walk herself upstairs, where Marcinkova and Epstein were waiting. [redacted] would remove her clothing and join them on the bed. [redacted] explained Marcinkova and she would begin by kissing and touching each other. [redacted] explained sex toys were brought into the bed by either Epstein or Marcinkova and they would begin using the toys on each other. Epstein would perform oral sex on either person depending who was on top during the intercourse. [redacted] explanation revealed they were in a missionary position.

[redacted] advised one day, [redacted] was unable to state and exact date when this incident occurred), she came to the house after Sara had informed her that Epstein had arrived. She arrived at the house and went upstairs to the master bedroom. [redacted] advised she immediately removed her clothing, as Nada Marcinkova and Epstein were already naked in the bedroom. [redacted] explained that Nada Marcinkova and she had a sexual encounter to include kissing, touching and oral sex. [redacted] remembered that she climaxed and was removing her self from the massage table. [redacted] asked for a sheet of paper and drew the massage table in the master bathroom and where Epstein, Marcinkova and she were. Epstein turned [redacted] on to her stomach on the massage bed and inserted his penis into her vagina. [redacted] stated Epstein began to pump his penis in her vagina. [redacted] became upset over this. She said her head was being held against the bed forcibly, as he continued to pump inside her. She screamed no, and Epstein stopped. She told him that she did not want to have his penis inside of her. Epstein apologized for his actions and subsequently paid her a thousand dollars for that visit. Additionally, shortly thereafter, Epstein gave [redacted] a 2005 Doge Neon, blue in color for her personal use.

[redacted] advised there were times that she was so sore when she left Epstein's house. [redacted] advised she was ripped, torn, in her vagina area. [redacted] advised she had difficulty walking to the car after leaving the house because she was so sore. [redacted] advised that other

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than that one time, when Epstein inserted his penis inside her vagina, there was no other penile intercourse.

[REDACTED] provided names of girls that she knew of that have gone to Epstein's house. [REDACTED] provided the name of [REDACTED] and feels she still may be going to the house to massage Epstein. According to [REDACTED], [REDACTED] is still sucking his dick."

When asked if she had been recently contacted by anyone of the house, [REDACTED] advised she received an email from Sara, from [REDACTED]net, which is her email account. The email was just a hello, how are you doing type of email. There had been no other contact from the house. The interview was concluded and [REDACTED] left the area. The tapes and drawing were submitted into evidence.

Investigation continues...

**************************** N A R R A T I V E # 12 **************************

NA Reported By: RECAREY, JOSEPH 11/01/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 12, 2005, Det. Dawson and I traveled to the Orlando area and made telephone contact with [REDACTED] [REDACTED] agreed to meet with us as we were in the Orlando area. [REDACTED] provided directions to her apartment. Det. Dawson and I met with [REDACTED] who stated, during a sworn taped statement that nothing happened between her and Epstein. [REDACTED] appeared nervous during the interview. I assured her that I had spoken with other people who advised differently. [REDACTED] stated she only went a couple of times and provided a massage to Epstein. She stated she was brought to the Epstein house in March of 2005. [REDACTED] brought her to work. [REDACTED] has no formal training in providing massages. [REDACTED] stated she provided a massage, fully clothed for $200.00. As I sensed hesitancy in her answers, I asked [REDACTED] if she had been contacted by anyone from the house. [REDACTED] stated she was interviewed already by an investigator for Epstein. He met with her on October 8, 2005, at a Roadhouse in Orlando. He identified himself as Paul and inquired about the police investigation and left his telephone number [REDACTED] for additional contact. [REDACTED] provided no additional information, as it appeared her responses were almost scripted. We left the area and returned to Palm Beach Police Department.

Based on the information acquired during the interviews, a search warrant was prepared for entry at the Epstein home. On October 18, 2005, I met with Judge Laura Johnson who reviewed the warrant request. She found there was sufficient probable cause and signed the warrant request. On October 20, 2005, at approximately 9:36 am, members of the Palm Beach Police Investigations Unit executed the search warrant at 358 El Brillo in Palm Beach. Members of the Investigations Unit included Capt Gudger, Sgt Frick, Det. Dicks, Det. Dawson, Det. Melnichok, Det. Sandman, Det. Krauel, the crime scene unit and myself.

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As we entered onto the property, we encountered the house manager, Janusz Banasiak who was in the guest portion of the house. The guesthouse section had open doors and no forced entry was made. I made contact with Banasiak, Date of Birth [redacted] Fl DL [redacted], and informed him of the search warrant for the premises. The members of the Police Department entered the residence and announced we had a search warrant. A safety search was done and members exited the home. I read the search warrant to Banasiak as Mgr Parkinson videotaped the search warrant execution. Several interior decorators were located on the property. I spoke with Mark Zeff, of [redacted] New York. Mr. Zeff stated he is the designer for Mr. Epstein's homes. He advised he was contacted in March of 2005 to do a complete overhaul on the house. He advised he was on the phone with Mr. Epstein when officers announced the search warrant. Mr. Epstein was then made aware of the search warrant. Mr. Zeff advised, his contact with Epstein is strictly business and he has never witnessed Epstein with any girls except for his assistants, Sara or Nada.

I then interviewed Daniel Estes, of [redacted] in New York. Mr. Estes stated he has worked for Zeff for seven years. He advised he personally worked on the New York and Palm Beach home for Mr. Epstein. He has previously met with Sara and Adrianna, Epstein's assistants in New York and in Florida. Estes stated they travel with Epstein everywhere he goes.

I interviewed Zara Bailey of [redacted] New Jersey. Bailey stated she just arrived from Scotland and has worked with Zeff for only one month. She stated she has never met Epstein and has not seen him. The interview was then concluded.

I then spoke with Douglas Schoettle [redacted] New York City. Schoettle stated he has been Epstein's Architect for seven years. He further stated he deals with Epstein's assistants and speaks with Epstein on the phone. Schoettle stated he mainly speaks with Sara Kellen, Epstein s main assistant, who travels with Epstein. Schoettle stated he only has contact with Epstein when his services are needed.

At approximately 10:30 am, I was informed that the videotaping was concluded. I entered the residence and located two covert (hidden) cameras. The first camera was a covert wall clock in the garage area. I traced the wire behind the clock and removed the RCA wire and unplugged the camera. The other covert camera was located within a desk clock beside Epstein's desk. I traced the wire behind the clock and unplugged the RCA wire. I could not locate another camera. I then began with the search of the residence for the specified evidence.

My search consisted of the second floor. Det. Krauel and I began in the master bedroom area where several items were located. They were

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marked to be retrieved by the evidence custodian. In the master desk with Epstein's notepads marked Jeffrey Epstein we located a high school transcript from [redacted] High School for [redacted] [redacted] Also in the room, was the dresser /armoire where we located a bottle of peach flavored Joy Jelly (Sexual Lubricant). Additionally, there were several photographs of young naked teenage girls within the closet, which was consistent with what the witnesses said. The massage table was also located within the master bedroom. Video tapes were located beside the television, which were also collected. An itemized list of the property and locations was prepared on the property receipts. At approximately 2:55 pm, the house was secured; the exit of the residence was videotaped. Upon our exit of the property, I encountered Atty. Guy Fronstein who advised he was representing Mr. Epstein. He provided a business card and provided his assistance with the investigation.

Due to Hurricane Wilma, which struck South Florida causing massive power outages, the courthouse was closed due to the lack of power. I was previously told that the Chief Judge had extended the filing deadlines due to the hurricane and the Courthouse being closed. On October 27, and 28, 2005 the courthouse was closed and I could not file the search warrant and inventory at the clerk's office. On October 31, 2005, I responded to the courthouse and filed the paperwork along with an order to seal, signed by Judge Johnson, to deny any release of any paperwork on this case.

INV CONTINUES..

**************************** N A R R A T I V E # 13 **************************

NA Reported By: PARKINSON, GREGORY A. 10/20/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, at approximately 8:30 a.m., Thursday morning, I was advised by Captain Gudger that a search warrant would be executed and that I was to assemble the Crime Scene Investigative Team and stand by the south side of the building ready to go. I designated Evidence Specialist Annette Badger to handle the inventory return, the documentation of the property receipts and the collection and bagging of the evidence at the scene. I further instructed CSI Kim Pavlik, ID # 8807, to accompany us and perform the role of photographing the scene and the items that may be taken into custody by the affiant, Detective Joseph Recarey, ID # 7915.

My responsibility was to go through from the reading of the warrant to the final exit from the residence and perform a video recording of the reading of the warrant, the initial walk through of the residence showing the current condition and then finally a walk through of the residence at the time of the police exit.

We started out towards the residence, which was located at 358 El Brillo and arrived at approximately 9:33 a.m. The search was conducted, items were collected by Evidence Specialists Badger,

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photographed by CSI Pavlik and then videotaped by myself. The search was concluded at approximately 3:05 p.m. whereupon Detective Recarey and I were the last two officers in the house. Upon securing the residence we met with the gentleman who identified himself to Detective Recarey as the lawyer for the defendant and he was informed that the residence was secured and that copies of the inventory return had been left on the first floor table of the personal assistant's office.

Detective Recarey and I returned to Police Headquarters and secured for the day.

*************************** N A R R A T I V E # 14 **************************

NA Reported By: DAWSON, MICHAEL C. 11/07/05
Entered By.: ALTOMARO, NICKIE A. 11/07/05

On October 20, 2005, I assisted Defective Recarey in the execution of a search warrant at 358 El Brillo Way, Palm Beach, Florida, 33480.

Upon the announcement of the search warrant, immediate contact was made with three white males who came out of the house or surrounding structures. Those males were identified as Janusz Banasiak, Daniel Estes, and Mark Zeff. As other members of the police department cleared the home, I kept watch over these three males. Once the house was cleared, those males were turned over to Detective Recarey.

Detective Dicks and I were assigned to assist in the search of the main house, the cabana and the servant's quarters. We started in the garage. All areas of the garage were searched to include four vehicles. These vehicles were three black Mercedes Benz cars registered to Jeffrey Epstein. The fourth vehicle was a Harley Davidson motorcycle, green in color, registered to Jeffrey Epstein. Nothing was recovered from the garage.

A towel closet and pantry located off the kitchen were searched and yielded negative results.

The kitchen was searched and taken into evidence was a phone message book that was located near a house phone.

North of the kitchen was an office room which contained a computer. The room had a closet that contained a locked gun locker. The combination was entered by Banasiak in the presence of Sgt. Frick and the safe was opened. Items were taken from the room. See the completed property receipt for a detailed list.

A green bathroom located on the first floor was searched and nothing was taken.

A closet located just west of the green bathroom was searched. Two massage tables were located in the closet along with a photo of a nude

Case No. . . . . : 1-05-000368 (Continued)

female from the waist up. See the property receipt for details.

I searched two bedrooms and their adjoining bathrooms, which were located on the second floor on the East side of the house. In the Northeast bedroom closet I found adult sex toys called Twin Torpedoes. Soap made in the shape of a penis and vagina were also found in these upstair bedrooms. See the property receipt for details.

I searched the pool cabana located on the South side of the pool. Photos were taken from the wall. See the property receipt for details.

I assisted in the search of Banasiak's living quarters. Numerous CD s along with a message book was seized. See the property receipt for details.

*************************** N A R R A T I V E # 15 **************************

NA Reported By: RECAREY, JOSEPH 11/08/05
Entered By.: ALTOMARO, NICKIE A. 11/08/05

On November 1, 2005, I was contacted by Atty. Gus Fronstin, who advised he was willing to assist with the investigation. Atty. Fronstin advised he would try to have his client, Jeffrey Epstein available to be interviewed. I explained I would be interested in conducting an interview with his client as well as other employees that are employed within the house. Atty. Fronstin advised he would return my call once he received confirmation on the interviews.

On November 6, 2005, I attempted contact with [REDACTED] at her residence. I left a business card for her to return my call. Upon returning to the police department, I had received a telephone call from [REDACTED] I returned her call at [REDACTED] and spoke with [REDACTED] She made arrangements to respond to the station to provide an interview. At approximately 3:30 pm, she arrived at the Palm Beach Police Station with her boyfriend. Her boyfriend was allowed to sit in the lobby area while Ms. [REDACTED] was interviewed.

I took Ms [REDACTED] to the Detective Bureau Interview room. I closed the door for privacy and explained to her that I appreciated her coming to the police station for the interview. During the sworn taped statement, she advised she was at Jeffrey Epstein s house one time. Approximately two months ago, she was approached by a girl, [REDACTED] [REDACTED] who was dating her roommate, to make some quick money. [REDACTED] advised she was in need to make some quick cash to make the rent that month. She agreed to go to the house. She had been told by [REDACTED] [REDACTED] that the massage would have to be done in her underwear. She advised [REDACTED] drove with her and brought her into the house. They walked into the kitchen area and took the stairs upstairs. [REDACTED] further stated she was brought into a master bedroom area. She advised she recalled seeing portraits of naked women throughout the room. A massage table was already out near the sauna/shower area in the master bedroom. Epstein entered the room wearing only a towel and

Case No. . . . . : 1-05-000368 (Continued)
introduced himself as Jeff. ██████ advised she recalled she and ██████ removed their clothing down to their panties, Epstein lay on his stomach area and they provided a massage on his legs and feet area. I asked ██████ if she had any formal massage training and she replied no. ██████ advised she was topless and the panties she wore were the boy shorts lace panties. She and ██████ continued the massage until the last ten minutes of the massage, Epstein, told ██████ to leave the room so that ██████ could finish the massage.

██████ got dressed and Epstein turned over onto his back. Epstein then removed the towel, which had been around his waist. Epstein laid there naked and requested that ██████ rub his chest area. ██████ stated as she did this, Epstein, began masturbating as she rubbed his chest. ██████ stated he pulled down her boy short panties and he produced a large white vibrator with a large head. She stated it was within a drawer in his master bathroom. He rubbed the vibrator on her vagina area. ██████ advised he never penetrated her vagina with the vibrator.

He continued to rub her vagina with the vibrator as he continued to masturbate. ██████ stated she was very uncomfortable during the incident but knew it was almost over. Epstein climaxed and started to remove himself from the table. He wiped himself with the towel he had on previously and went into the shower area ██████ got dressed and met with ██████ in the kitchen area. Epstein came into the kitchen and provided ██████ $200.00 for bringing ██████ and paid $200.00 to ██████ for providing the massage. ██████ was told to leave her telephone number with Sarah, his assistant for future contact. ██████ provided her cellular telephone number for future contact. ██████ was asked if she was recently contacted about this investigation by anyone from the Epstein organization. She replied she was called but it was for work. She stated she was called by Sarah for her to return to work for Epstein. ██████ stated work is the term used by Sarah to provide the massage in underwear. ██████ advised she declined, as she was not comfortable in providing that type of work. The interview was concluded and the videotape was placed into evidence.

Investigation Continues..

**************************** N A R R A T I V E # 16 ****************************
NA Reported By: RECAREY, JOSEPH 11/10/05
Entered By.: ALTOMARO, NICKIE A. 11/10/05

On November 7, 2005, I made telephone contact with ██████ who advised she would be able to meet with me at her home. Det. Sandman and I traveled to her home in Royal Palm Beach and made contact with ██████ During a sworn taped statement, ██████ stated she met Jeffrey Epstein through Haley Robson. Robson would approach females who wished to work for him. ██████ stated she was asked to work for him but declined. ██████ explained that work means give massages. She was asked about any formal training in providing massages to which she said no. ██████ said she accompanied Robson and other females

Case No. . . . . : 1-05-000368 (Continued)

who were taken to Epstein s house to provide massages. [REDACTED] further stated she had been to the house approximately 4 or 5 times in the past year. She accompanied Robson with [REDACTED] [REDACTED] the 14-year-old victim, and [REDACTED]. Each time the girls were taken over, they were previously told they would have to provide a massage, possibly naked. It was also told that should Epstein require them to do anything extra and they were not comfortable just to tell him and he would stop. [REDACTED] stated Robson received $200.00 for each girl she brought over to massage Jeffrey Epstein. When I asked which girl appeared to be the youngest, she replied, the victim, as she stated she was fifteen years old at the most; she looked really young. [REDACTED] further stated each time she went to the house, she sat in the kitchen and waited with Robson until the massage was over. She further stated that the cook would make lunch or a snack for them as they waited. I asked her if there was anything that caught her attention within the home. [REDACTED] stated there were a lot of naked girls in photographs throughout the house. The interview was concluded and the tape was turned into evidence.

Investigation Continues..

***************************** N A R R A T I V E # 17 ***************************

NA Reported By: RECAREY, JOSEPH 11/10/05
Entered By.: ALTOMARO, NICKIE A. 11/10/05

Det. Dawson and I attempted contact with [REDACTED] in Royal Palm Beach. I left my business card at her front door. Ms [REDACTED] returned my call and arranged a meeting with me at the Palm Beach Police Department for November 8, 2005. At approximately 2:00pm, [REDACTED] arrived at the Palm Beach Police Department. She was brought into the interview room and the door was closed for privacy. She was told that I appreciated her coming to the police station for questioning regarding an on going investigation. She was told that I was investigating a crime involving Jeffrey Epstein and knew, based on the investigation, that she had encounters with him in the past. During a sworn taped statement, [REDACTED] stated she had met Epstein approximately two years ago. She was first introduced to Epstein by Haley Robson. Robson approached her about working for Epstein and providing a massage to him for $200.00. The arrangements were made and as Robson could not take her the day the arrangements were made, [REDACTED] took [REDACTED]. [REDACTED] also attended [REDACTED] High School and was familiar with Epstein.

[REDACTED] recalled she was brought there and entered through the back kitchen door. She had met with an assistant Sarah and another assistant Adrianna. Sarah brought her upstairs as she observed several photographs of naked females throughout the house. [REDACTED] stated Epstein came in the room, wearing only a towel, and laid on the table. [REDACTED] stated he picked out the oils he wanted her to use and requested she remove her clothing to provide the massage. [REDACTED] stated that on the first massage she provided she did not remove her

Case No. . . . . : 1-05-000368 (Continued)
clothing. [REDACTED] stated she had returned several times after that. Each time she returned more things happened. [REDACTED] stated that the same thing would happen. Epstein would walk into the master bedroom/bathroom area wearing only a towel. He would masturbate as she provided a massage. [REDACTED] stated she was unsure if he climaxed as he masturbated under the towel. Additionally she never looked blow his waist. She claimed that Epstein would convince her to remove her clothes. She eventually removed her clothes and stayed in her thong panties. On occasion, Epstein would use a massager/vibrator, which she described as white in color with a large head on her. Every time she provided a massage he would masturbate. [REDACTED] added she has no formal training in providing a massage. [REDACTED] stated she brought two females during her visits to provide massages. [REDACTED] stated she brought a girl named [REDACTED] and [REDACTED] from [REDACTED] High School. [REDACTED] stated she received $200.00 for each girl she brought. Additionally, [REDACTED] was given $200.00 for taking her in the very beginning. The interview was concluded and the tape was placed into evidence.

Investigation continues...

**************************** N A R R A T I V E # 18 **************************
NA Reported By: RECAREY, JOSEPH 11/13/05
Entered By.: ALTOMARO, NICKIE A. 11/14/05

On November 8, 2005, I made telephone contact with [REDACTED] W/F, [REDACTED] 987, at her residence. [REDACTED] responded to the police station for an interview reference an ongoing investigation. At approximately 2:30 pm, she arrived at the Palm Beach Police Station and was brought into the interview room for the interview. The door was closed for privacy and she was told that I appreciated her cooperation in this case. During a sworn taped statement, [REDACTED] stated she had met Jeffrey Epstein approximately one year ago. She was approached by a subject known to her as [REDACTED]. [REDACTED] had asked her if she wanted to make money providing massages to Epstein. [REDACTED] had heard that several girls from [REDACTED] High School were doing this and making money. She agreed and was taken to the house by [REDACTED]. [REDACTED] had introduced her to Sarah and Epstein and brought her upstairs to a master bedroom and Master bathroom where a massage table was prepared and the proper oils were taken out. [REDACTED] left the room and waited downstairs for [REDACTED] [REDACTED] stated Epstein entered the room wearing a towel and she provided a massage wearing only her thong panties. [REDACTED] advised Epstein had masturbated every time she provided a massage. She stated Epstein continued to masturbate until he climaxed; once that occurred the massage was over. She felt the whole situation was weird but she advised she was paid $200.00 for providing the massage. She also stated [REDACTED] received $200.00 for bring [REDACTED] to Epstein.

[REDACTED] stated she had gone a total of 15 times to his residence to provide a massage and things had escalated from just providing a

Case No. . . . . : 1-05-000368 (Continued)
massage. Epstein began touching her on her buttocks and grabbed her closer to him as he masturbated. Epstein also grabbed her breasts and fondled her breast with his hands as she provided the massage. [REDACTED] stated on one occasion, he offered extra monies to have vaginal intercourse. She stated this all occurred on the massage table. [REDACTED] stated Epstein penetrated her vagina with his penis and began having intercourse with her until he reached the point of climax. Epstein removed his penis from her vagina and climaxed onto the massage table. [REDACTED] received $350.00 for her massage. I asked her if she had any formal training in providing massages, [REDACTED] stated she did not.

[REDACTED] continued to state on one other occasion, Epstein introduced his assistant, Nada, into the massage. Nada was brought into room with [REDACTED] to provide a massage. Epstein had them kiss and fondle each other around the breasts and buttocks as they provided a massage to Epstein. Epstein, watched and masturbated as this occurred. On other occasions, Epstein introduced the large white vibrator/massager during the massage. Epstein stroked the vibrator/massager on [REDACTED]s vagina as she provided the massage.

[REDACTED] stated the last time she spoke with anyone at the house was with Sarah during the weekend of October 2 or 3, 2005. [REDACTED] stated she had brought two people to the Epstein house. She provided the names of [REDACTED] and [REDACTED] (unknown last name). It should noted [REDACTED] had been previously identified as [REDACTED] and had been previously interviewed. The interview was concluded and the videotape was placed into evidence via the locker system.

On November 9, 2005, Sgt Frick and I traveled to [REDACTED] in Boynton Beach, Florida in hopes to interview Juan Alessi, the former houseman of Epstein's home. As no one was home, a business card was left for him to return my call. We then traveled to [REDACTED] in Miami in hopes to interview Alfredo Rodriguez, a former house man of Epstein. We did not locate them at home. I left a business card for him to return my call.

We then traveled to Lynn University and met with Dean of Students, Mr. Turner. We requested to speak with [REDACTED]. [REDACTED] was re interviewed, as she still was in possession of the rental car that Epstein had acquired for her. [REDACTED] stated that Sarah, Epstein's assistant, had called her on her cellular telephone and informed her that rental was extended for her. Sarah stated she had paid an additional $625.00 for her to keep the rental an extra month. [REDACTED] was asked if she had any additional contact with either Epstein or anyone from his organization. [REDACTED] stated she did not, other than the telephone call informing her that she could keep the car for an extra month. [REDACTED] did not provide any additional information.

On November 10, 2005, at approximately 9:47 am, Alfredo Rodriguez had telephoned reference my business card found on his door. Rodriguez stated he had worked with Epstein for approximately six months after

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the previous houseman left. Rodriguez stated that it was his responsibility to keep the identity of the masseuses private. Mr. Epstein had a massage in the morning and one in the afternoon. Mr. Rodriguez stated he would rather speak about this in private. He advised he would come to the police station to speak with me. Rodriguez stated he would return my call on Monday, November 14, 2005.

I then made telephone contact with Juan Alessi. He advised he found my card on his door and wanted to know what I needed to speak with him about. I explained to Alessi that I was conducting an investigation on his former employer, Mr. Epstein. Alessi stated he would return my call shortly as he was in the middle of a project at his home. I received a telephone call from Attorney Donald Morrell from [redacted] Mr. Morrell stated he represented Mr. Alessi and did not want me speaking with his client. I then made telephone contact with the State Attorney s Office and confirmed that subpoenas would be issued to the former employees to assist in the investigation.

I then made telephone contact with Attorney Guy Fronstin, attorney for Mr. Epstein. I explained to Mr. Fronstin that I would like to speak with Mr. Epstein. He stated Mr. Epstein is not in residence in Florida at this time and would check with him to ascertain if he could be here by Wednesday November 16, 2005 for an interview. Mr. Fronstin stated he would return my call should Mr. Epstein decide to come in to the police station for an interview.

Investigation continues.

**************************** N A R R A T I V E # 19 ***************************

NA Reported By: RECAREY, JOSEPH 11/15/05
Entered By.: ALTOMARO, NICKIE A. 11/16/05

On November 14, 2005, Det. Sandman and I traveled to [redacted] [redacted] in Loxahatchee, Florida and spoke with [redacted] She was told of the ongoing investigation involving Epstein. [redacted] advised she had gone to the house on several occasions. During a sworn taped statement, she advised she started going to the house approximately one year ago and was brought by [redacted]. [redacted] stated [redacted] brought her into the house and she was introduced to a girl named Sarah. Once she met her, Sarah brought her upstairs into a master bedroom bathroom. [redacted] stated she met Jeffrey in the bathroom. He lay on the table and picked the massage oils. She provided the massage, as he lay naked on the massage bed. She stated she rubbed his calves and back area. Upon the end of the massage, Epstein removed himself from the massage table and paid her $300.00 for the massage.

[redacted] stated she had only been at the house approximately five or six times. [redacted] said each time she went to the house she was notified by Sarah, Epstein's assistant, that Epstein was in town and would like her to work. [redacted] stated she returned to the house and was again led upstairs by Sarah. She provided the massage, clothed.

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[REDACTED] advised it wasn't really weird until later on. [REDACTED] was asked if she ever removed her clothing to provide a massage. [REDACTED] stated it was not until the third time she went that she removed her clothing. [REDACTED] stated she was notified by Sarah that Epstein wanted her to come to work. She arrived at the house and was led upstairs by Sarah. She started providing the massage when Epstein asked her to remove her clothing. [REDACTED] removed her pants, shirt and bra. She stayed in her thong panties and continued rubbing Epstein. Epstein turned over onto his back and she rubbed his chest area. [REDACTED] stated she knew he was masturbating himself as she providing the massage. [REDACTED] stated she believed he climaxed based on his breathing. She did not want to view either the climax or the fact that he was masturbating. [REDACTED] stated once the breathing relaxed he got up and told her to get dressed. She was paid $300.00 for her services.

[REDACTED] stated on the last time she went to provide a massage, she was notified by Sarah to come to the house and work. [REDACTED] stated she was now dating her current boyfriend and did not feel comfortable going. She recalled it was approximately January 2005. She said she went, already thinking that this would be the last time. She went upstairs and went into the master bathroom. She met with Epstein, who was wearing only a towel as he entered the room to lie on the table. [REDACTED] stated Epstein caught her looking at the clock on several occasions. Epstein asked her if she was in a hurry. [REDACTED] stated her boyfriend was in the car waiting for her. [REDACTED] further stated that Epstein got upset, as she wasn't enjoying the massage. She told him that she didn't want to continue and she would not be back. Epstein told her to leave as she was ruining his massage. I asked her if she had any contact with Epstein's organization, she stated she received $200.00 from Western Union in Royal Palm Beach and Okeechobee Blvd as a Christmas gift. [REDACTED] advised she had no formal training in provide any massages. [REDACTED] also stated she was sixteen years old when she first went to Epstein's house.

At approximately 4:22 pm, I made telephone contact with [REDACTED] at [REDACTED] She agreed to meet with me at a public place. I suggested she come to the police station for an interview. [REDACTED] did not want to meet at the police station. I recommended we meet at the Palm Beach Gardens Mall in the food court area. She agreed and an appointment was made for November 15, 2005 at 5:00 pm at the food court.

Investigations Continue.

***************************** N A R R A T I V E # 20 **************************
NA Reported By: SANDMAN, JENNIFER R. 11/16/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

On 10/20/2005, I assisted executing a search warrant at 358 El Brillo Way in the Town of Palm Beach, Palm Beach County Florida under the direction of affiant Detective Joe Recarey.

Case No. . . . : 1-05-000368 (Continued)

Detective Melnichok and I searched the pantry room that is west next to the kitchen. This room had all white cabinets with a dark grey and black counter top. We did not find anything in this room.

We searched the yellow and blue room that is west next to the pantry room. This room had a very large statue of man with a bow. Taken into evidence from this room were nine photographs in frames of various women.

We searched the main entrance foyer that is to the north of the yellow and blue room. This room contained two bamboo chairs and ottomans with cushions. It also contained a round table with numerous books.

We searched another blue room that is west of the foyer. This room had a stereo system and book shelves that were from the floor to the ceiling. Taken into evidence from this room were eight photographs in frames of various women and/or Epstein, the owner of the residence.

We searched the room to the west of the blue room that has sliding glass doors that lead out to the pool. In this room in a dresser were two DVD's and two VCR tapes. These items were taken into evidence.

We searched a 2004 black Chevy Suburban bearing Florida tag X99-EGL, registered to Jeffrey Epstein DOB [redacted], which was located on the east side of the driveway facing south. I found a Thrifty rental agreement between the passenger seat and the middle console. The name on the rental agreement was Johanna Sjoberg from [redacted] [redacted] The phone number on the rental agreement was [redacted] The vehicle rented was a white [redacted]. The vehicle was rented on 9/25/05 at 17:58 hours and was returned on 9/26/05 at 16:52 hours. The last four numbers of the credit card used are [redacted]. Detective Melnichok found a piece of paper in the middle console that said I used the cash in here to fill up the tank and was signed by Johanna.

I searched the 2005 black Cadillac Escalade ESV bearing Florida tag Q29-9GT, registered to Jeffrey Epstein dob [redacted] which was located on the west side of the driveway facing south. I did not find anything in this vehicle.

All of the items that were taken into evidence were photographed in the place they were located and then turned over to crime scene.

**************************** N A R R A T I V E # 21 **************************
NA Reported By: RECAREY, JOSEPH 11/17/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

Case No. . . . : 1-05-000368 (Continued)

On November 15, 2005, Det. Sandman and I traveled to [redacted] in Royal Palm Beach. We met with [redacted], a seventeen-year old juvenile who was not in school this day due to a cold from which she was suffering. [redacted] was told that I needed to speak with her in reference to an ongoing investigation involving a subject she would know as Jeffrey Epstein. Prior to speaking with her, I explained that because of the fact that she is a minor, I needed to speak with her parents prior to speaking with her. She telephoned her father, Mr. [redacted] on his cell phone and explained to him that Det. Sandman and I were there to speak with her. I spoke with Mr. [redacted] on the telephone and informed him I needed to speak with his daughter in reference to an ongoing investigation. Mr. [redacted] advised he had no problem with us speaking with his daughter.

During a sworn taped statement, [redacted] stated she met Jeffrey Epstein over a year ago. She was sixteen years of age and was approached by [redacted] who informed her that she could make monies providing a massage to Epstein for $200.00. [redacted] had informed her that she would have to provide this massage topless. [redacted] made the arrangements with Epstein and his assistants and took [redacted] to the house. [redacted] stated [redacted] and she entered through a glass door that led into a kitchen. [redacted] took her upstairs, to a master bedroom and master bathroom. She recalled the bathroom had a large pink couch, sauna and matching shower. Epstein entered into the room wearing only a towel. [redacted] and [redacted] removed their clothing remaining only in thong underwear. She further stated that Epstein lay on his chest on the table. Epstein selected which oils to use for the massage. Both [redacted] and [redacted] provided the massage on his legs, back and feet. Forty minutes into the massage, Epstein turned over onto his back and requested [redacted] wait downstairs in the kitchen area for [redacted]. Epstein instructed [redacted] to finish the massage. As [redacted] got dressed, [redacted] starting rubbing his chest. [redacted] left the room, and Epstein began masturbating himself as [redacted] rubbed Epstein s chest. [redacted] stated he continued masturbating until he climaxed on the towel he was wearing. When asked if he had removed the towel she stated he turned the towel around so that the opening would allow him to expose himself. After he cleaned himself off with the towel, he instructed [redacted] the massage was done and to get dressed and met with him downstairs. [redacted] got dressed and met with Epstein in the kitchen area. She was paid $200.00 dollars for providing the massage. [redacted] stated she was aware that [redacted] also received monies for the same thing.

The second time she went to the house she was again approached by [redacted]. [redacted] asked if she wanted to return to the house to provide another massage; [redacted] agreed and the arrangements were made by [redacted] for her to return to the house. [redacted] stated [redacted] drove her to the house and knocked on the same glass door that leads to the kitchen area. They were allowed entry into the house by one of the staff members. [redacted] led her upstairs to the master bedroom and

Case No. . . . : 1-05-000368 (Continued)

master bathroom area. [redacted] left [redacted] this time to do the massage alone. Epstein entered the room again wearing only a towel. [redacted] began removing her clothing as she did the last time she was at the house. Epstein instructed her to get naked. He lay on the table on his stomach as [redacted] began massaging his legs and back.

As [redacted] finished with Epstein's back and legs, Epstein then turned over onto his back. [redacted] started to rub his chest and he began masturbating himself. As [redacted] rubbed his chest, Epstein leaned over and produced a massager/vibrator. He turned it on and began rubbing [redacted]s vagina and masturbating himself at the same time. [redacted] stated she continued to rub his chest as this was occurring. She described the vibrator/massager as large, grey with a large head. Epstein rubbed her vagina for approximately two to three minutes with the massager/vibrator. He then removed the vibrator from her vaginal area and concentrated on masturbating himself. [redacted] stated he climaxed onto the towel again and informed her that the massage was done. [redacted] got dressed and met with [redacted] who was waiting in the kitchen area. She received $200.00 for the massage. [redacted] said she never returned to the house and had no desire to return to the house. [redacted] was asked if she received any formal massage training. She advised she had no formal training. [redacted] was asked if Epstein knew her real age. [redacted] stated he knew as he asked her questions about herself and high school. He was aware she attended and is still attending [redacted] High School.

The interview was concluded. I suggested [redacted] inform her parents of what occurred at the Epstein house. [redacted] stated she would tell her father as he was unaware this had occurred. I left my business card for any questions they may have. We left the area and returned to the police station. The tape was placed into evidence.

Investigation Continues.

**************************** N A R R A T I V E # 22 ****************************

NA Reported By: RECAREY, JOSEPH 11/17/05
Entered By.: ALTOMARO, NICKIE A. 11/17/05

On November 15, 2005, Officer Munyan and I responded to the Palm Beach Gardens Mall food court section to meet with [redacted]. At approximately 5:10 p.m., [redacted] arrived and met with us at the food court. [redacted] provided a sworn taped statement in which she stated she had been at the Epstein house over fifty times. She began going to Epstein's house when she turned eighteen years old. [redacted] was asked if she knew of the on-going investigation. [redacted] stated she was aware there was an investigation as she had been told by other girls that were interviewed. Additionally, she has had several telephone conversations with Epstein's assistants as to what had been going on during the investigation.

I asked [redacted] how she was introduced to Epstein. [redacted] stated she did not want to disclose who brought her to the house but she would

Case No. . . . : 1-05-000368 (Continued)

respond to any other questions. When I asked her what happened at the house, [redacted] stated everything happened. It all began with the massages. Each time she went more things happened. She would massage Epstein and he would masturbate and climax. She stated things escalated from there. She provided oral sex on Epstein and he provided oral sex on her. She stated he would also use a massager/vibrator on her vagina to stimulate her as she massaged him. He introduced his assistant Nadia or Nada to have vaginal intercourse with [redacted]. She stated Nada or Nadia would utilize a strap-on (synthetic penis) to have intercourse with her. She was told to masturbate herself as Epstein and Nada had sexual intercourse. All this was done at Epstein's direction.

[redacted] could not provide exact dates as she had been to the house so many times. [redacted] stated Epstein inserted his fingers in her vagina to stimulate her as she massaged him. When I asked her if there had been any vaginal intercourse with Epstein, she stated she did not have sex with him. She did admit having sex with Nada, his assistant. [redacted] stated not every time she went involved sexual favors. Sometimes she would just talk with him and get paid. I asked her how much she was paid each time she went to Epstein s residence. [redacted] stated she got paid $300.00 every time she went to the house. She was told to bring other girls to him to provide massages. [redacted] declined stating that she does what she does and did not want to introduce anyone else to do what she does. [redacted] stated she had never received any formal training in providing massages.

I showed [redacted] a photo line up in which Nada Marcinkova was placed in position six. She reviewed the six photographs and immediately identified Nada Marcinkova as the person with whom she had intercourse. Additionally, it was the same person she watched have intercourse with Epstein. She signed the photo line-up under Nada Marcinkova s photo as the person she identified. We then left the mall and returned to the police station. The photo line up and tape were placed in to evidence.

Investigation Continues...

**************************** N A R R A T I V E # 23 **************************
NA Reported By: RECAREY, JOSEPH 11/29/05
Entered By.: ALTOMARO, NICKIE A. 12/01/05

On November 17, 2005, I received a phone message from Atty. Guy Fronstin who advised to call his cellular phone reference his client Jeffrey Epstein. I telephoned his cell phone and left a message for him to return my call. I did not receive a call back on Thursday, November 17, 2005. On Friday, November 18 2005, I retrieved another voice mail from my work phone from Mr. Fronstin advising he would not produce his client Jeffrey Epstein for any statement. Fronstin stated he had spoken with ASA Lana Belohlavek and expressed Mr. Epstein has a passion for massages. I called ASA Lana Belohlavek and confirmed that

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Fronstin had telephoned her reference this case. Although nothing was discussed, Mr. Fronstin did advise her that Epstein is very passionate about massages.

I also spoke with ASA Daliah Weiss reference the previous employees, Juan and Maria Alessi. She advised that they had been served through a subpoena process server. They were both scheduled to appear on Monday November 21, 2005 at 12:00 p.m.

On November 21, 2005, I met with ASA Weiss, Atty. Donnie Murrell and Juan and Maria Alessi at the State Attorney Office. ASA Weiss had requested a court reporter to be present to take the statement of the Alessi s. I spoke with Maria Alessi, in the presence of her attorney, Donnie Murrell. She advised she had worked for Epstein for eight years, from the period of 1994 through 2002. She advised she had never had any direct conversations with him. She stated it was her husband who spoke directly with Epstein. Her work consisted of doing house cleaning, shopping and other preparations when Epstein would arrive in town. Alessi stated the preparations consisted of preparing the house and bathrooms for his arrival. She advised she did view several masseuses that arrived at the house. She advised that two or three girls would come during a day and provide the massages. The girls that arrived looked young in age. Mrs. Alessi did not know any of the girls personally and were always different. She was told that when Epstein was in residence he did not want to encounter the Alessis during his stay in Palm Beach.

I then spoke with Mr. Alessi in the presence of his attorney, Donnie Murrell. Mr. Alessi stated that he was employed for eleven years with Mr. Epstein. He originally was hired as a part time employee and then moved up into a full time position. His duties included everything. Alessi stated he was the house manager, driver and house maintenance person. It was his responsibility to prepare the house for Epstein s arrival. When asked about cooks or assistants, Alessi stated they traveled with Epstein on his private plane. He remembered dealing with his girlfriend, Ms. Maxwell originally and then dealt with Epstein directly.

I asked Mr. Alessi about massages that occurred within the home. Mr. Alessi stated Mr. Epstein had up to three massages a day. Each masseuse that visited the house was different. Alessi stated that towards the end of his employment, the masseuses were younger and younger. When asked how young, Mr. Alessi stated they appeared to be sixteen or seventeen years of age at the most. The massages would occur in Epstein's bedroom or bathroom. There were times he recalled that he would set up the massage tables either in Epstein s bedroom or in his bathroom. I asked if there were things going on other than a massage. Alessi stated that there were times towards the end of his employment that he would have to wash off a massager/vibrator and a long rubber penis, which were in the sink after the massage. Additionally, he stated the bed would almost always have to be made after the massage. Alessi was never privy to what went on during the

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massages.

He was asked if he remembered any names of the girls that massaged Epstein. He tried to remember and was unable to provide any exact names of any girls. Alessi was asked about any contact with anyone from the Epstein organization. Alessi said he did speak with Mr. Epstein shortly after my initial contact with him to find out what was going on. Alessi also stated that approximately on November 11, 2005, he was contacted by a private investigator from the Law Office of Roy Black. The investigator had called him to meet with him to ascertain what he was going to tell the police. Alessi stated they met at the Carrabba s Restaurant in Boynton Beach and discussed the same questions I was asking him. I informed Mr. Alessi and Mr. Morrell that as this is an ongoing investigation and anything we discuss should be confidential. They both acknowledged the fact that the information would be kept confidential. It should be noted that a court reporter was present during the interviews and would be providing a copy of the statements to me when they become available.

On November 21, 2005, I received a voice mail from Mr. Fronstin who advised he would not be making Mr. Epstein available for any statements. He did have some words that he wanted to relay on behalf of Mr. Epstein. I telephoned his office and left a message for him to return my call.

On November 29, 2005, I received a call back from Mr. Fronstin who left a voice mail after hours on November 28, 2005, advising he would return my call during normal business hours to speak with me reference the case on November 29, 2005.

*************************** N A R R A T I V E # 24 *************************

NA Reported By: RECAREY, JOSEPH 11/29/05
Entered By.: ALTOMARO, NICKIE A. 12/01/05

On November 29, 2005, at approximately 2:30 p.m. I received a telephone call on the department issued cell phone. Mr. Fronstin stated he was calling to relay information that Mr. Epstein wished he could relay. Mr. Fronstin stated that he would not allow Mr. Epstein to speak with me at this time. He further stated that Mr. Epstein is very passionate about massages. He continued that Mr. Epstein had allegedly donated over $100,000 to the Ballet of Florida for massages. The massages are therapeutic and spiritually sound for him that is why he has had many massages. Mr. Fronstin stated he appreciated the way the investigation has not been leaked out into the media. I explained to Mr. Fronstin that it is as important to protect the innocent if the allegations are not substantiated. Mr. Fronstin was told of the allegations that the private investigators assigned to the case have been portraying themselves as police officers. Additionally, I explained that my cell phone had been called by the private investigators. Mr. Fronstin advised he was not aware of that and advised they were under the direction of Attorney Roy Black in

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Miami. Mr. Fronstin further stated Epstein had originally called Mr. Dershorwitz in Boston, who recommended Roy Black in Miami, who asked Mr. Fronstin to assist. I informed him that if and when any charges would be presented I would notify him. The call was then terminated.

Investigation continues.

*************************** N A R R A T I V E # 25 *************************

NA Reported By: RECAREY, JOSEPH 12/15/05
Entered By.: ALTOMARO, NICKIE A. 12/16/05

A review of the telephone message books, which were obtained during the search warrant, was conducted in which various messages from different dates were made to Jeffrey Epstein. The telephone message books have a duplicate copy (Carbon Copy) which, once a phone message is written into the book, the top copy is then torn on the perforated edge and the carbon copy is left in the book. First names of girls, dates and telephone numbers were on the copy of the messages. I recognized various numbers and names of girls that had already been interviewed. The body of the messages was time of the day that they called for confirmation of "work." Other names and telephone numbers were located in which the body of the messages were, "I have girls for him" or "I have 2 girls for him." These messages were taken by Sarah for Jeffrey Epstein. Based on the context of the body of the messages, I requested subpoenas for subscriber information on the telephone numbers and the time frame involved. Copies of the messages were made for evidentiary purposes.

I obtained [REDACTED] High School yearbooks for 2005, 2004 and 2003. I first reviewed the 2005 yearbook and located most of the girls I had spoken with. Additionally, I located [REDACTED] Based on the corrected name spelling, I was able to locate her to her residence in Loxahatchee. On December 8, 2005, Det. Caristo and I responded to [REDACTED] Loxahatchee. I located [REDACTED] at her home. She advised she is attending [REDACTED] High and is participating in the early release program so she can maintain her part time job. As she is still a minor, I left my business card to have her mother return my call to request an interview with her daughter. We then left the area.

I also had previously researched the telephone number for [REDACTED] and telephone number [REDACTED] A subpoena had been issued for the information on [REDACTED] The telephone number was registered to [REDACTED] A query of [REDACTED] revealed that she is the daughter of [REDACTED] and is currently residing at [REDACTED] West Palm Beach. Det. Caristo and I attempted contact with [REDACTED] with negative results. I left my business card on her front door requesting she return my call. We then responded to [REDACTED] I also attempted contact with [REDACTED] with negative results. I left my business card for him to return my call.

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On December 9, 2005, I received a telephone call from [redacted] 's mother, who was made aware of the on going investigation in Palm Beach. [redacted] advised she was told of everything that occurred at Epstein's house involving Epstein and his staff. She advised she would allow me to question her daughter about what occurred and would cooperate with the investigation. [redacted] provided me with [redacted] s cellular telephone number to schedule an appointment for an official interview. I telephoned her cellular telephone and made a tentative appointment for Monday, December 12, 2005.

I then received a telephone call from [redacted], father of [redacted] who stated he found the business card on his door. I explained that I was conducting an investigation and needed to speak with [redacted] as she may have information that could assist in the investigation. Mr. [redacted] stated that his daughter no longer resides with him and has her own trailer in another trailer park. He advised he would tell her to call me.

On December 12, 2005, due to a conflict with schedules, arrangements were made to meet with [redacted] on Tuesday, December 13, 2005 at 5:00 pm. On December 13, 2005, Det. Dawson and I traveled to Loxahatchee and met with [redacted] During a sworn taped statement, [redacted] stated that when she was sixteen years old, she was taken to Epstein's house to provide a massage for money. [redacted] stated it was before Christmas last year when [redacted] approached her and asked if she needed to make money for Christmas; [redacted] stated she did and agreed to provide a massage for money. [redacted] made arrangements to take [redacted] to the house and drove [redacted] to the house to "work." [redacted] stated she could not remember the street name but would be able to drive to the street. They drove to the last house on the street and pulled in the last house on left side. They walked up the driveway and entered through a side gate which led to a kitchen door. They knocked on the door and were encountered by an employee who [redacted] described as a "Spanish looking lady." They informed her that they were expected. They were then encountered by a white female with long blond hair. [redacted] was unable to remember the name of the white female with blond hair but knew she was Epstein's assistant. She was led upstairs by the white female who explained that there would be lotions out already and Epstein would choose the lotion he wanted her to use. She was led through a spiral staircase which led to a master bedroom and bathroom. The massage table was already set up in the bathroom. [redacted] described the bathroom as a large spacious bathroom with a steam room and shower beside it with a sink to the right. [redacted] was introduced to Jeff who was on the phone when she entered. Jeff was wearing a white towel and lay on his stomach so that [redacted] may massage his feet and calves. [redacted] started the massage with the massage oil Jeff chose and rubbed his feet and calves. Jeff got off the phone and requested she massage his back as well. [redacted] began rubbing his back and got to the small of his back. During the rubbing of his back Jeff asked her to get comfortable. He

Case No. . . . . : 1-05-000368 (Continued)
requested she remove her pants and shirt. [redacted] removed her shirt and pulled her pants off. [redacted] stayed in her bra and thong panties. As she finished the small of the back, Jeff then turned onto his back. He instructed she rub his chest and pinch his nipples. As she began to rub his chest, Jeff asked her questions about herself. [redacted] remembered telling him she attended [redacted] High School. Jeff asked her if she was sexually active. Before [redacted] could answer, he also asked what sexual positions does she enjoy. [redacted] stated she was shy didn't like talking about those things. She continued rubbing his chest. Epstein reached up and unsnapped her bra from the front. [redacted] explained the bra she used had a front snapping device. Epstein rubbed her breasts and asked her if she like having her breasts rubbed. [redacted] said "no, I don't like that." Epstein then removed his towel and lay on the bed naked exposing his penis to [redacted] He began touching his penis and masturbated as he touched her breasts. [redacted] explained Jeff then touched her vagina area by rubbing her vagina with his fingers on the outside of her thong panties. [redacted] tensed up and stated Jeff was aware that she was uncomfortable.

[redacted] stated that Jeff told her , "Relax, I'm not going inside." She further explained Jeff commented to her how beautiful and sexy she was. Jeff then moved her thong panties to one side and now was stroking her clitoris. [redacted] said "Jeff commented how hard my clit was." He then inserted two fingers in her vagina and was stroking her within her vagina. She tried pulling back to pull out his fingers from within her vagina. Jeff removed his fingers from within her vagina and apologized for putting his fingers inside her. During this time he kept his hand on her vagina area rubbing her vagina. [redacted] stated he rubbed her real hard as he was masturbating. [redacted] said he climaxed onto the towel he had been previously wearing and got up from the table. Jeff told her there was $200.00 dollars for her on the dresser within the master bathroom. Jeff also told her that there was an additional $100.00 that was to be given to [redacted] for bringing her there to massage him. Jeff told her to leave her telephone number with his assistant as he wanted to see her again. Jeff stated his assistant would contact her to work again soon.

I asked her if she ever received any formal massage training to which [redacted] stated she did not. [redacted] stated it was the only time she ever went to work for Jeff and knew what happened to her was wrong. She stated she no longer speaks to [redacted] because she was upset that [redacted] took her there. She further stated that she had never been contacted for any additional work. The interview was terminated and we left the area.

Investigation Continues...

***************************** N A R R A T I V E # 26 **************************
NA Reported By: DICKS, ALLEN C. 12/18/05
Entered By.: ALTOMARO, NICKIE A. 12/19/05

Case No. . . . . : 1-05-000368 (Continued)

On 102005 at approx 0930hrs I assisted with the execution of a search warrant at 358 El Brillo Ave, Palm Beach.

Initially I was assigned to enter the residence and conduct a sweep of the premises for safety purposes. I then accompanied CSEU tech Pavlik while she photographed the exterior of the house. Once this was complete I was assigned to search certain areas of the house with Det. Dawson as part of the search warrant.

We began in the garage, searching three Mercedes Benz vehicles, a Harley Davidson motorcycle and adjacent closets in the garage. Nothing of evidentiary value was located.

We then searched two closets off the kitchen area on the east side. These can best be described as pantry or storage closets. Nothing of evidentiary value was obtained.

A small office with adjoining bath was then searched. In the bath area I located a phone message book with recent messages. This item was seized as evidence. Please note this bath and shower area are not used as designed but are storage areas containing a variety of items to include a gun safe in the shower and assorted household items.

We then searched a bath area and closet at the base of the main stairs in the foyer. Inside the closet two massage tables were located as well as partial nude female photographs. These items were later seized as evidence. Nothing of evidentiary value was noted in the bathroom.

We then searched two bedrooms upstairs on the east side of the residence. Located in the bath room of the south bedroom was penis shaped soap. Located in the bedroom of the northern bedroom was penis and vagina shaped soap as well as an adult sex toy. These items were seized as evidence.

We then searched the pool cabana located in the south west corner of the property. Several photographs of nude females were seized as evidence.

I was then assigned to stand by with a person I believe was Douglas Schoettle. Mr. Schoettle was in the residence at the beginning of the search warrant. He was present during the warrant service and subsequent search. I stood by with him until the search was completed and I departed the residence. I had no conversation with him regarding the reason for our presence.

Regarding seized evidence, all items were photographed in place and then collected by CSEU personnel.

This concludes my involvement in this case.

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************************** N A R R A T I V E # 27 *************************
NA Reported By: KRAUEL, CURTIS D. 12/21/05
Entered By.: ALTOMARO, NICKIE A. 12/21/05

On Thursday, October 20, 2005 at approximately 0936 hours, I assisted in the execution of a search warrant located at 358 El Brillo Way, Palm Beach, Florida, residence of Jeffrey Epstein. I was instructed by Case Agent Det. Joseph Recarey, to secure all computer and media related material from the residence.

Upon my arrival I was directed by Det. Recarey to a room designated as the Kitchen Staff Office. I observed a, Silver in color, CPU with the left side cover removed, exposing the CPU s hardware sitting on floor next to a glass type desk. The CPU had no discernable identifiers or features indicating a make or model. This CPU was powered off with the power cord not plugged in. The keyboard and mouse were atop the CPU. It should be noted that the CPU was not connected to a monitor, printer, or other media device. On the back Panel of the CPU, I observed an A/V card with RCA jacks attached. This type of hardware would allow audio and video to be downloaded onto the CPU s hard disk. The ends of the RCA jacks were unattached at the time of the search and no external camera was located within this room.

The CPU was located on the right side of a desk that held a flat panel LCD screen. The desk also held another keyboard and mouse, indicative of a second computer; however, no other computer was found. It appeared as though a second computer had been recently removed as the cables ends from the monitor, keyboard and mouse were in the same area. A further search of the room revealed no media storage devices, i.e. CD s, Floppy Disks, Zip Disks, etc. This type of media is commonly stored in an area where computers are placed, yet no media was found.

After completing a search of this room, I secured the CPU and turned all items over to the Evidence Custodian for future forensic analysis via a property receipt.

I was then directed by Det. Recarey to a room designated as the Garden Room, where I observed a wooden desk facing west. The desk held a flat screen LCD monitor, keyboard, mouse, media card reader and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

Det. Recarey directed me to a third location designated as the Cabana room, which is detached from the residence and located just south of the pool. In the South East corner of the room, I observed an office type setting, with an L-shaped desk holding a flat screen LCD monitor, keyboard, mouse and printer; however, no CPU was located. All of the cables were removed from an area where a computer had once been. A search of the desk area revealed no signs of any media devices.

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Det. Recarey directed me to a second detached structure located on the South East corner of the property. This area of this structure was assigned with single letters to identify a particular part of the room. In the office area, designated as Room B, I observed a powered on Dell Dimension 2350, attached to an LCD flat panel monitor. The screen displayed an open Microsoft Internet Explorer browser with URL address of http://home.bellsouth.net/. I observed no other active windows in the Start panel window and photographed screen. The power cord was removed from the back of the Dell CPU and I disconnected the cable modem to prevent remote access. At that time, the Dell CPU, marked with Serial Number 6WTVN21, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room B, which were recorded onto a property receipt and turned over the Evidence Custodians.

I then responded to a Bedroom designated as Room F, where I observed a white in color CPU marked Premio. The Premio CPU was in a computer desk which held a white CRT monitor, both of which were powered on. The CRT monitor displayed a message from Norton Antivirus software, warning of an expired subscription. I observed no other active windows in the Start panel window and photographed screen. I removed the power cable from the back of the Premio CPU and shutdown all other media. The Premio CPU, marked with Serial Number 2000091078, was secured and turned over the evidence custodian for future forensic analysis via property receipt. I also located several media related items within Room F, which were recorded onto a property receipt and turned over the Evidence Custodians.

This concluded my participation in the search of the residence.

*************************** N A R R A T I V E # 28 **************************

NA Reported By: RECAREY, JOSEPH 12/21/05
Entered By.: ALTOMARO, NICKIE A. 12/21/05

On December 20, 2005, I contacted ASA Daliah Weiss in an attempt to subpoena the Epstein former houseman, Alfredo Rodriguez. Rodriguez, who resides in Miami, had eluded the process servers previously and was not served the investigative subpoena. A telephone message was left as she is not available during the week of 12/19/2005. I made contact with State Attorney Inv Theresa Wyatt and requested the same via telephone message.

I then researched the victim's SG cellular telephone subpoena data which had been received from a previous subpoena request. I analyzed the records which depict several calls from Haley Robson. The telephone calls start on February 6, 2005 at 12:49 pm.; the same day which the victim and the victim's father stated the incident occurred at Epstein s house. The first incoming call was from Robson's residence at [redacted] The second incoming call from Robson's

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cellular phone [redacted] occurred at 1:02 pm. The call durations were one minute or less. The time frame was within thirteen minutes apart. It should be noted that Robson s residence was in close proximity to the victim's. The next call occurred at 5:50 pm when the victim telephoned Robson s residence. Several calls were made after the above mentioned calls both incoming and outgoing to Robson. Further analysis showed no telephone calls to either Robson's cellular telephone or Robson's residence were registered prior to February 6, 2005.

Additionally, I also conducted an analysis on the telephone calls from [redacted]. The subscriber information confirmed that the number is registered to Paul A Lavery from Hialeah, Florida. The address was crossed referenced to the Office of Kiraly and Riley Private Investigators. I researched the web page www.rileykiraly.com which also showed various cases in which they assisted. I also located another web site under www.coralspringssparklandrotary.org in which Mr. Riley attended a Miami Rotary meeting and confirmed Atty. Roy Black is among his clientele.

The telephone calls revealed Lavery had telephone contact with [redacted] either just after I attempted to interview them, or just prior. A background was conducted on Lavery which revealed he holds a current Private Investigator License. A criminal arrest record revealed he had been previously arrested for possession of cocaine and solicitation of prostitution.

I also researched the girls using www.myspace.com. This web site is a new social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. The site allows one to establish your own myspace.com page and decorate the page any way one wishes. I found the following people have myspace sites: Haley Robson, [redacted]

I received a Cingular Wireless packet which contained a CD which contained the results of the subpoena request for verbatim calls on [redacted] An analysis will be conducted in the near future on the phone numbers called.

Investigation Continues.

**************************** N A R R A T I V E # 29 **************************
NA Reported By: RECAREY, JOSEPH 12/27/05
Entered By.: ALTOMARO, NICKIE A. 12/29/05

Upon doing research on the message books recovered in the search warrant, I located the identity of [redacted] The telephone number [redacted] was registered to [redacted] She currently is seventeen years old and is attending the [redacted] Academy. I

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responded to 1801 Palm Beach Lakes Boulevard, also known as the Palm Beach Mall. I located the [REDACTED] Foundation. I located [REDACTED] inside the foundation and informed her that I was investigating a case against Jeffrey Epstein and knew she had been at the house. [REDACTED] started to cry and advised she had put that part of her life behind her. I explained that although she is seventeen years old I needed to inform her parents that she would be interviewed. She provided her home telephone number. I attempted contact and left voice mail messages at the house to speak with her parents.

Det. Caristo and I then located [REDACTED] at her residence located at [REDACTED] in West Palm Beach. I attempted to interview her about Jeffrey Epstein. She advised she is so in love with Jeff Epstein and would do anything for him. She further explained that she would not speak with us about him either negative or positive. She asked us to leave her property. I informed her that although she did not wish to speak with us, I had sufficient information at this point in the investigation to know she was at Epstein's house and provided girls to Epstein to work. I also explained that prior to our arrival at her residence I had telephone contact with her father [REDACTED] who was told she would be interviewed. [REDACTED] is currently seventeen years old and as a juvenile, parental notification would be required. We then left the area and returned to the police station.

While at the police station, I left another telephone message for [REDACTED]'s parents. I began an analysis of Sarah Kellen's Cellular telephone. The telephone number [REDACTED] is assigned to Sarah Kellen and the financially responsible party is Jeffrey Epstein of 457 Madison Ave. in New York City, New York. The time frame which was subpoenaed was September 2005, through October 2005. There were eighty seven pages of calls made either to the cell phone or from the cell phone. The local (561) numbers were analyzed. A spread sheet was prepared and placed into the attachment file of who was called.

The unknown numbers were researched using FoneFinder.com and subpoenas were requested to determine subscriber information. This was done to identify additional victims or witnesses. The analysis revealed that Kellen had called the victim/witnesses frequently when Epstein was in the Town of Palm Beach to "work." This confirms what the girls interviewed had previously stated. Kellen would notify them when Epstein was in town and their willingness to "work." The CD was placed into evidence.

Investigation Continues.

**************************** N A R R A T I V E # 30 **************************

NA Reported By: RECAREY, JOSEPH 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On December 29, 2005, I received a facsimile from National Compliance

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Center from Cingular Wireless for telephone number [redacted]. This was the telephone number for Haley Robson during the time frame when the victim, [redacted] was brought to the Epstein house to "work." An analysis of the phone records, of all incoming and outgoing calls, showed that on February 6, 2005, the day the victim, [redacted] was brought to the house, Robson first called Sarah Kellen, Epstein's assistant, at [redacted] at 12:50 pm (EST). The next call was made to Epstein's house in Palm Beach, at 12:52 pm (EST). The following call was made to the victim, [redacted] at 1:01 pm (EST) and at 1:02 pm (EST). This confirms the information provided by the victim and victim's father. I photo copied the records and enlarged the page 8 of 10 to show the calls made by Robson on February 6, 2005.

To this date, I have not heard from [redacted]s parents. I will attempt to establish contact with them during the evening hours. I received a package from Atty. Guy Fronstin, which was hand delivered at the police station. Within the package, was a letter from Alan Dershowitz, and two www.myspace.com profiles. The profiles were that of [redacted] and [redacted] MySpace.com is a social networking service that allows members to create unique personal profiles online in order to find and communicate with old and new friends. This package was in response to a previous meeting in which Mr. Dershowitz called to assist in the investigation in providing any additional witnesses such as house employees who have been reluctant to speak with law enforcement.

I reviewed the profiles Mr. Dershowitz enclosed. [redacted] who designed her blog to be "[redacted] Fucking [redacted] " still attends [redacted] High School, sends and receives messages from friends which contain some profanity. Upon reviewing her friends' comments section from Myspace, most of her good friends sent messages to establish contact and invite her to go out.

I then reviewed [redacted]s web blog which was provided by Mr. Dershowitz. Ms. [redacted] designed her blog to be "[redacted] " Her blog states that her interests include music, theater and weed (Marijuana). I reviewed her packet in which [redacted] declares her love for her live-in boyfriend. She also describes using marijuana with her boyfriend [redacted] [redacted]

The letter Mr. Dershowitz sent advised he was looking into the allegation that one of the private investigators used by the private attorneys of Epstein, attempted to impersonate or state that they were police officers from Palm Beach. Mr. Dershowitz advised that the investigators used to interview [redacted] had "quite a distinct speech impediment", did not claim to be nor did they impersonate themselves as a police officer. This package was sent to both ASA Lana Belohlavic and ASA Daliah Weiss at the State Attorney's Office.

I made telephone contact with ASA Weiss to confirm she received the package and request an interview with Sarah Kellen, Nada Marcinkova, and Janusz Banasiak. She advised she would assist in attempting to

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contact Mr. Dershowitz.

On January 3, 2006, I received a telephone call from ASA Weiss who informed me that she made telephone contact with Mr. Dershowitz. She had requested the employees be available the week of January 3, 2006. Mr. Dershowitz informed her that the assistants are out of the country and would require additional time to locate them and make them available.

Investigation Continues.

*************************** N A R R A T I V E # 31 *************************
NA Reported By: MINOT, LORI S. 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On Thursday, 03/31/05, I started conducting surveillance at 358 El Brillo. At this point I observed at 1155 hours, a Tan Altima bearing FL tag [redacted] in Roadway, Black SL bearing FL tag [redacted] in drive, Tan Honda Civic bearing FL tag [redacted] in Roadway, Black Chevy Suburban in driveway and a Black Caddy Escalade in driveway. At 1325 Hours I observed Tan Honda Civic [redacted] in roadway, Black Chevy Suburban in driveway, Black Caddy Escalade in drive and a White Kia car bearing FL tag [redacted] At 1615 hours I observed a Tan Honda Civic, [redacted] in roadway, Black Chevy Suburban in drive, Black Caddy Escalade in driveway and a White Kia car [redacted] in roadway.

On Friday, 04/01/05, I continued surveillance at 358 El Brillo. At 1130 hours I observed a Tan Honda Civic bearing FL tag [redacted] in roadway, Black Caddy Escalade in driveway and a Tan unknown make/model bearing FL tag [redacted] in roadway. At 1227 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Caddy Escalade in driveway and a Black Chevy SUV located behind the Escalade. At 1345 hours, I observed a Tan Honda Civic [redacted] in roadway and a Black Chevy SUV in driveway. At 1558 hours, I observed a Tan Honda Civic [redacted] in roadway, Black Chevy SUV in driveway, Black Caddy Escalade in driveway and a dark unknown model/make car parked in garage.

On Saturday, 04/02/05, I continued surveillance at 358 El Brillo. At 0713 hours, I observed a Red Explorer bearing FL tag [redacted] in roadway and a Black Caddy Escalade in driveway. At 0814 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway and a Tan Honda Civic [redacted] At 0952 hours, I observed a Red Explorer [redacted] in roadway, Black Caddy Escalade in driveway, Tan Honda Civic [redacted] in roadway and also a Grey unknown make/model with a B.M in trunk retrieving landscaping tools.

At 1155 hours, I observed a Grey Camaro bearing FL tag [redacted] parking in the roadway in front of 358 El Brillo. A W/F, blond hair, teens to early 20's, thin and tall wearing a white tank top and short blue jean shorts, exited the vehicle and walked to the rear of the house. I also observed a Red Explorer [redacted] in roadway, Tan Honda Civic [redacted] in roadway and a Black Caddy Escalade in driveway. At 1310 hours, I

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observed a Red Explorer W/F driver leaving the area, Tan subcompact on roadway and a Red Neon bearing FL tag [REDACTED] Then observed 3 W/Fs, approximately 16 to 18 years of age jogging. All 3 females ran into the driveway. There were 2 with blond hair and one brown hair.

On Sunday, 04/03/05, I continued surveillance at 358 El Brillo. At 0719 hours I observed a Tan Honda Civic [REDACTED] in roadway and a Black Caddy Escalade. At 0934 hours, I observed a Tan Honda Civic [REDACTED] in roadway and a Black Caddy Escalade in driveway. At 1057 hours I observed only the Tan Honda Civic [REDACTED].

On Tuesday, 04/05/05, I continued surveillance at 358 El Brillo. At 1052 hours, I observed a Red Explorer [REDACTED] in roadway, a Green Explorer, bearing FL tag [REDACTED] in roadway, a Grey Altima bearing FL tag [REDACTED] in roadway, White Ford Truck [REDACTED] in roadway, Black Mercedes in driveway being washed by a B/M and an unknown dark car parked in the garage. At 1059 hours a Blue Chevy Suburban drove to the house of 358 El Brillo and parked in the driveway. At 1119 hours, I observed the White Fort Truck [REDACTED] leave the area and the drive was the pool man.

At 1126 hours, I observed a Grey unknown make/model car park in roadway. W/M got out of the car and walked to a house on the south side of El Brillo. At 1406 hours, I observed a Red Explorer parked on roadway and a large white box truck parked behind the surveillance suburban.

**************************** N A R R A T I V E # 32 ***************************

NA Reported By: BATES, MICHAEL J. 1/03/06
Entered By.: ALTOMARO, NICKIE A. 1/03/06

On 03/31/05, at approximately 1500 hours while conducting surveillance at 358 El Brillo, I observed a Black Cadillac Escalade, unknown tag, a Black Chevrolet Suburban, unknown tag, a Black Mercedes S600 FL tag [REDACTED] parked in the east driveway next to the 3-car garage. There was a Tan Honda Civic FL tag [REDACTED] parked on the street in front of the residence.

At approximately 1700 hours, I observed the Black Suburban, Black Escalade, Black Mercedes and Tan Honda Civic parked in the same place. At 1750 hours, there was no change in vehicles. At 1840 hours, I observed the Black Escalade, Black Suburban and Black Mercedes along with a Silver Hyundai Accent FL tag [REDACTED] all parked in the east driveway and a Red Ford Explorer FL tag [REDACTED] parked on the street in front of the residence.

At 2000 hours, I observed the Black Escalade, Black Suburban parked in the ease driveway and the Red Explorer and Tan Civic parked on the street.

On Friday, 04/01/05 at approximately 1700 hours, I observed the Black

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Escalade and Black Suburban parked in the east driveway and the Tan Honda Civic parked on the street in front of the residence. At 1820 hours, I observed the Suburban and Civic in the same place and a Gold Chevrolet Camaro FL tag [redacted] parked on the street in front of the residence. At 2250 there was no change. At 2330, I observed the Black Escalade parked in the driveway and the Red Explorer parked on the street in front of the residence.

On Saturday, 04/02/05 at approximately 1700 hours, I observed a Black Escalade, unknown tag, parked in the driveway and a Tan Honda Civic FL tag [redacted] parked in the street in front of the residence. At 1805 hours the Escalade and Civic were in the same position and the Black Mercedes FL tag [redacted] was also parked in the east driveway. At 1920 hours the Escalade and Civic were the only vehicles and both were in the same position. At 2030 hours and 2145 hours there were no vehicles observed.

At 2115 hours, I observed a Black Mercedes, 4-door parked in the east driveway FL tag [redacted] At 2300 hours, 2350 hours and 0045 hours, the Black Mercedes was the only vehicle observed.

**************************** N A R R A T I V E # 33 **************************
NA Reported By: RECAREY, JOSEPH 1/05/06
Entered By.: ALTOMARO, NICKIE A. 1/05/06

I made contact with Mr. [redacted], father of [redacted], who was told that I wished to interview his daughter. Mr. [redacted] stated he was aware and had spoken with his daughter about the incident. He stated that his daughter had previously told him that she was hired to model lingerie at a Palm Beach mansion. Mr. [redacted] stated he knew nothing else about what she did when she went to "work." Mr. [redacted] advised he would cooperate with the investigation and make his daughter available for interviews. I asked if she was available for an interview, [redacted] stated she was not at home at the moment. I informed him I would make contact with her at a later time. Mr. [redacted] expressed his interest in the resolution in this matter as he stated this information has affected his daughter emotionally.

On January 4, 2005, I acquired the subpoenas from the State Attorney's Office for Cingular Wireless, Metro PCS, Verizon, Bell South Telecommunications and Sprint for the unknown telephone numbers from Sarah Kellen's cellular telephone. The subpoenas were sent to the respective telephone carriers for subscriber information.

I received a telephone call from State Attorney's Office, who informed me that the former houseman for Jeffrey Epstein, Alfredo Rodriguez, was present at the State Attorney's Office for an interview. Rodriguez was issued an investigative subpoena for an interview on the on-goings at Epstein's house during his employ. I responded to the State Attorney's Office and encountered Mr. Rodriguez waiting in the lobby. I brought Mr. Rodriguez to the interview room.

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During a sworn taped statement, Mr. Rodriguez stated he was employed by Jeffrey Epstein for approximately six months. He was referred by associates and his employment lasted the months of November 2004 through May 2005. His responsibilities as house manager included being the butler, chauffer, chef, houseman, run errands for Mr. Epstein and provide for Epstein's guests. Rodriguez advised he had very limited contact with Mr. Epstein. If Rodriguez needed to relay a message to Mr. Epstein, he would have to notify Epstein's secretary "Leslie" in New York City, who would then notify Epstein's personal assistant, Sarah, who would relay the message to Epstein. Rodriguez stated Epstein did not want to see or hear the staff when he was in residence.

I asked Rodriguez if Epstein received many guests during his stay in Palm Beach. Rodriguez advised he had many guests. I asked specifically about masseuses coming to the house. Rodriguez stated he would have two massages a day. Epstein would have one massage in the morning and one massage in the afternoon everyday he was in residence. Rodriguez stated he would be informed to expect someone and make them comfortable until either Sarah or Epstein would meet with them.

Rodriguez stated once the masseuses would arrive, he would allow them entry into the kitchen area and offer them something to drink or eat. They would then be encountered by either Sarah or Epstein. They would be taken upstairs to provide the massage. I asked Rodriguez if any of the masseuses appeared young in age. He advised he didn't ask their ages but felt they were very young. Rodriguez stated they ate like his own daughter who is in high school. Rodriguez stated they would eat tons of cereal and drink milk all the time. Rodriguez stated the girls that would come appeared to be too young to be masseuses. He stated one time under Epstein's direction, he delivered a dozen roses to [REDACTED] High School for one of the girls that came to provide a massage. He knew the girls were still in high school and were of high school age. I asked Rodriguez about the massages. He felt there was a lot more going on than just massages. He would clean Mr. Epstein's bedroom after the alleged massages and would discover massager/vibrators and sex toys scattered on the floor. He also said he would wipe down the vibrators and sex toys and put them away in an armoire. He described the armoire as a small wood armoire which was on the wall close to Epstein's bed.

Epstein ordered Rodriguez to go to the Dollar rent a car and rent a car for the same girl he brought the roses to, so that she could drive her self to Epstein's house without incident. Rodriguez said the girl always needed rides to and from the house. Rodriguez referred himself as a "human ATM machine" and was ordered by Epstein to maintain a minimum balance of $2,000 dollars on him at all times. When a girl would come by the house and Mr. Epstein was either not in residence or was not at home at the time, Rodriguez was to provide the girl (masseuse) several hundred dollars for their time and to notify Epstein the amount they were given. Epstein also ordered Rodriguez to

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purchase several gifts and provide them as tips to the girls. I asked what kind of gifts. Rodriguez stated he purchased IPODS, jewelry, anything the girls would want.

Rodriguez stated the amount of girls that came to the house was approximately fifteen. Each of the girls knew each other and all seemed to know at [REDACTED] High School who Mr. Epstein was. When asked to identify these girls, Rodriguez stated he could not at the moment but knew he wrote their names down on a journal he kept during his employ with Mr. Epstein. He kept a journal in the event he needed to explain either to Mr. Epstein or his assistants what was done at the house or who visited the house as he stated he was in-charge of Mr. Epstein's personal security while in Palm Beach. I informed him I would need to view this journal to which he stated he would research the book and contact me to provide the book. The interview was concluded and left the area. I returned back to the police station where the micro cassette was placed into evidence. At approximately 7:20 pm, I was notified Rodriguez located the journal and would call me on January 5, 2005 to provide the journal.

Investigation Continuesàà

**************************** N A R R A T I V E # 34 **************************
NA Reported By: RECAREY, JOSEPH 1/09/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

On January 5, 2006, I attempted to meet with Alfredo Rodriguez to recover the folder or journal in which he kept the notes that were given to him during his employ with Mr. Jeffrey Epstein. He kept this folder to justify what he did during his employ should the need arise to justify what occurred with the monies he had to keep or any questions as to the petty cash he withdrew from the household account from the bank. At approximately 10:00 pm, I attempted contact with Mr. Rodriguez and discovered he was assisting his wife at her place of employment and would not be able to meet with me. Mr. Rodriguez stated he would meet with me on January 6, 2006, in Broward County, in the morning hours.

On January 6, 2006, at approximately 9:00 am, I received a telephone call from Mr. Rodriguez who advised he had the file in hand and would be traveling northbound to meet with me in Broward County. At 10:50 am, I met with Alfredo Rodriguez at the parking lot of Bank of America in Boca Raton on Yamato Road and Military Trail (known as the Polo Center). Rodriguez produced a green folder which contained documents, a note with Mr. Epstein's stationary with direction to deliver a bucket of roses to [REDACTED] High School after [REDACTED] high school drama performance. Also in that same note was direction to rent a car for [REDACTED] and direction to extend the rental contract. I returned to the Palm Beach Police Station and placed the folder into evidence.

I received a fax from Verizon from the subpoena request sent on

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01-04-06, for telephone number [redacted] The phone number is registered to Dr Perry Bard, from West Palm Beach. Dr. Bard is a chiropractor and has an office located [redacted] in West Palm Beach. The cellular number is Dr Bard's personal cellular number.

On January 9, 2006, Det. Caristo and I traveled to [redacted] in Palm Beach Gardens in an attempt to locate Johanna Sjoberg, who had been previously seen on the property and identified through her Florida Drivers License and Florida license Plate. A business card was left for her to return my call. We then traveled to the [redacted] [redacted] Foundation and located [redacted]. [redacted] agreed to speak with us and in a private room within the school provided us a taped statement.

During the statement, [redacted] advised that when she was fifteen or sixteen years of age, she was taken to Jeffrey Epstein's house by her associate, [redacted] [redacted] stated this occurred late May 2004 or early June 2004. She was told she could model lingerie for money for a wealthy Palm Beacher. She remembered they traveled by yellow cab from their residence in West Palm Beach to Epstein's house. She remembered encountering Epstein at the front door during the evening hours.

He introduced himself and brought them into the kitchen so that the chef could prepare something for them to eat. After having a meal, [redacted] and Epstein brought [redacted] upstairs to a master bedroom which had a large bathroom. She observed a large style shower, sauna and there was a large massage bed also in the bathroom. Epstein entered a room within the bathroom and came out wearing only a towel. [redacted] said they would provide a massage on his feet. [redacted] asked why they are doing this. [redacted] told her this was part of the routine and told her to rub his legs and calves. Epstein had told [redacted] to get comfortable. [redacted] continued rubbing Epstein's calves and feet. At Epstein's direction, [redacted] then left the room leaving [redacted] there by herself. Epstein told [redacted] to get comfortable. [redacted] removed her blouse and pants and stayed in her panties. [redacted] stated she was not wearing a bra. She believed she was wearing thong panties. Epstein turned over onto his back and began touching her. Epstein touched her breasts and began touching her in her vagina area. Epstein instructed her to rub his chest and rub his nipples. [redacted] stated the touching consisted over the panties on the first time; he stroked her vagina but stayed on top of the panties. During the first massage, she stated Epstein was stroking her and began masturbating himself at the same time. He put his hands under the towel and appeared as to masturbate himself however she never saw his penis. She continued rubbing his chest until he grabbed her and pulled her closer to him. He appeared to have climaxed because after he pulled her closer to him the massage was over. Epstein had told her that there was two hundred dollars for her on the dresser. He told her that she could not tell anyone what happened at the house or bad things could happen. [redacted] stated she went to Epstein's house three

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or four times total. [REDACTED] was very scared and felt very nervous. She knew because of Epstein's money he was powerful. After the massage, Epstein ordered his houseman at the time to drive the girls home. The employee was to drop off the girls at their house and watch them go inside their house.

[REDACTED] could not remember who the houseman was. She stated Epstein and his assistant Sarah would call her at her father's house to arrange for her to come and "work." She advised each time she returned to the house, Epstein would do the same thing. [REDACTED] stated it was a routine with Epstein. She would rub his feet and calves. He would then turn over and begin to touch her on her vagina area. The only difference was that it was done without panties. Epstein's fingers would stroke her vagina area as he would masturbate and finally climax and the massage would be over. She was paid $200.00 each time she went. Each time she went she was reminded not to speak of what happened at the house and that she would be contacted again. She began to purposely miss the calls when either Sarah or Epstein would call her. She once brought a friend, [REDACTED] unknown last name, to work for Epstein. She was paid $200.00 for bringing [REDACTED] [REDACTED] stated she no longer retuned to work for Epstein. She also stated that she wanted to notify the police of what happened at the house. [REDACTED] stated she was scared of what could have happened to her or her family if she notified authorities.

On January 10, 2006, I received the results from the subpoena from BellSouth Telecommunications for telephone number [REDACTED]. The number is assigned to [REDACTED], [REDACTED]s father in Palm Beach Gardens. I also received the results from Western Union which confirmed the money order sent to [REDACTED] from Jeffrey Epstein in New York City. The "wire" was sent by Jeffrey Epstein of 457 Madison Ave in New York City on December 23, 2004 at 12:05 pm. The amount of $222.00 was charged to Epstein's credit card so that [REDACTED] could receive $200.00 in Royal Palm Beach. The twenty-two dollars was for processing and local fees to send the money via Western Union. A copy of the check presented to [REDACTED] was also attached to the receipt of the wire. This confirmed what [REDACTED] advised she received as a Christmas bonus from Epstein.

Investigation continues.

**************************** N A R R A T I V E # 35 ***************************

NA Reported By: RECAREY, JOSEPH 1/10/06
Entered By.: ALTOMARO, NICKIE A. 1/10/06

I received and reviewed the Cingular Wireless results from the subpoena requests for subscriber information for telephone numbers [REDACTED]. The first number, [REDACTED], is assigned to Janusz Banasiak in care of Jeffrey Epstein of 457 Madison Ave in New York City. Banasiak is the current houseman/house manager for 358 El Brillo Way in Palm Beach, Fl 33480. The second number, [REDACTED] is assigned to Christina Venero of

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[REDACTED] West Palm Beach. Research conducted on Venero revealed she is a licensed Massage therapist with a Florida conditional/active license number [REDACTED] Venero had been previously arrested for battery / unwanted touching and DUI. Requests for copies of the reports involving the arrests were requested from the Palm Beach County Sheriff's Office. The last number [REDACTED] is assigned to Thomas Rofrano of [REDACTED] Palm Beach Gardens. Research on Mr. Rofrano, revealed that he is a Florida Chiropractic Physician.

Vehicles that were previously documented on the property while surveillance was being conducted were researched. I determined a tan Chevrolet Camaro, bearing Florida license [REDACTED], was seen on the property in which a young white female was seen entering the Epstein property. Research was conducted which revealed that the vehicle is registered to [REDACTED] Mr. [REDACTED] has two daughters, [REDACTED] is currently residing in Connecticut and [REDACTED] is residing with her father in Lake Worth. Research on [REDACTED] revealed she was recently involved in a traffic stop in Lake Clarke Shores in May 19, 2005. A request to discover any information from the stop was requested.

I spoke with ASA Daliah Weiss who informed me that Janusz Banasiak will be available for an interview tomorrow at the State Attorney's Office in West Palm Beach at 1:30 pm. I informed her that I would be at her office for the interview.

*************************** N A R R A T I V E # 36 *************************

NA Reported By: RECAREY, JOSEPH 1/23/06
Entered By.: ALTOMARO, NICKIE A. 1/23/06

On January 19, 2006, Det. Caristo and I met with Johanna Sjoberg at [REDACTED] in Palm Beach Gardens. Sjoberg was identified as a licensed massage therapist who had previously been seen on Epstein's property when physical surveillance was done. Sjoberg was told of the on going investigation and I felt she may have information pertaining to the case. During a sworn taped statement, Sjoberg stated she met Epstein three years ago when Ghaline Maxwell approached her while she was attending Palm Beach Atlantic College to work around Epstein's house. Maxwell had told her that they needed some girls to work at the house to answer phones and run errands. Sjoberg accepted the job and began working at Epstein's house on El Brillo in Palm Beach. Sjoberg stated it was a part time job during the time she went to Palm Beach Atlantic College. She continued going to Epstein's house and would be notified when Epstein would travel to Palm Beach. Sjoberg advised she would be notified by Maxwell, Epstein or Sarah, his assistant, when he would travel to Palm Beach. Sjoberg stated she began providing massages to Epstein before she became a massage therapist. She continued giving massages not only to Epstein but to Nadia Marcinkova, and Sarah, his assistant. Sjoberg was asked about what occurred during the massages. Sjoberg stated as she was twenty

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three years old when she met Epstein, anything that happened was between two consenting adults. I explained to her that she was not in any trouble however as part of this investigation, I needed to ask certain questions. Sjoberg stated that there were times that Epstein would ask her to perform during the massage. He would instruct her to rub his nipples as he masturbated himself. Sjoberg stated she felt "grossed" about the behavior but as she was getting paid, she just continued. Sjoberg also advised she would on occasion perform the massages naked. Epstein would on occasion, utilize the vibrator/massager on her vagina area when she performed the massages. Sjoberg explained that Epstein never exposed himself to her as he maintained himself covered under the towel he would be wearing. When Epstein would masturbate he would be covered.

I asked if Sjoberg ever received any gifts, or any gratuities from Epstein. Sjoberg advised aside from being paid well, she advised Epstein took care of her tuition from Palm Beach Atlantic College. She received a rental car for a week when her scooter broke down.

Additionally she received other gifts from Epstein. Epstein also recommended her to another client who resides at Breakers Row in Palm Beach. The client she was referred to was "Glenn" unknown last name, and his wife, who she provided a massages to. The statement was concluded and placed into evidence upon our return to the Palm Beach Police Department.

While at the police station, I researched Florida tag [redacted] which was also previously seen on the property when there was physical surveillance being done at the property. The vehicle is registered to [redacted] Lake Worth, Florida. Researching Mr. [redacted] and the vehicle revealed that his daughter, [redacted] had been driving the vehicle and was cited for unlawful speed in Lake Clark Shores. The vehicle is a tan, Chevrolet Camaro, 2-door. I researched [redacted] date of birth, [redacted] 1987, resides at [redacted] has a my space page called [redacted] In her web page, shows various photos of [redacted] photographed at a beach. An interview is forthcoming.

A review of the video disks which was extracted at the Palm Beach County Sheriff's Office Computer Crime Unit revealed that only one hidden camera was functional at the time. Several images of Epstein working at his office were seen. Additional footage of Sarah Kellen and Nadia Marcinkova was seen. There was other footage of females seen. The identity of the females is unknown at this time, until such time as I meet with certain females to show the video footage to confirm if, in fact, it is them on the video. At this time it appears that [redacted] and Haley Robson are seen sitting with Epstein beside his desk in the evening hours. Due to poor lighting, a direct confirmation cannot be made at this time.

Inv. Continues.

Case No. . . . : 1-05-000368 (Continued)
**************************** N A R R A T I V E # 37 **************************
NA Reported By: RECAREY, JOSEPH 1/30/06
Entered By.: ALTOMARO, NICKIE A. 1/30/06

On January 25, 2006, Det Caristo and I, responded to [redacted] [redacted] and met with [redacted] [redacted] stated last year, when she was seventeen years of age, she met Jeffrey Epstein through her former room mate [redacted] [redacted] was allegedly dating Epstein at the time. [redacted] and [redacted] had once cohabitated together when they modeled. [redacted] explained [redacted] called her on her telephone and advised her that she was in Palm Beach and requested to see her. [redacted] made arrangements to meet with her at Epstein's house. [redacted] arrived and met Epstein and [redacted]. [redacted] and [redacted] went to the Palm Beach Mall together and went shopping. [redacted] advised that [redacted] and she had received money from Epstein to go to the mall. They visited Victoria's Secret and purchased undergarments from the store utilizing monies given by Epstein. [redacted] advised she purchased one item and [redacted] purchase various items. The money used to purchase the items was the money given by Epstein.

[redacted] and [redacted] continued shopping and having a day together. [redacted] stated [redacted] explained how she and Epstein have been dating each other and he has been paying all of her bills. [redacted] claimed [redacted] advised they met in New York and had been dating ever since. They later returned to Epstein's home and encountered Epstein. He had a brief conversation with [redacted] about her modeling career. He knew of her modeling career from [redacted]. He requested to see her modeling portfolio and explained that he could help her with modeling jobs. [redacted] had her book with her to show [redacted] and showed the book to Epstein. He commented negatively about her photographs and portfolio. [redacted] felt uncomfortable with the comments made as she had been working with other professional modeling companies who had offered her work from her photographs. Epstein requested to see what was purchased at the mall. [redacted] took out the undergarments which were purchased. She immediately showed Epstein different sets purchased. Epstein then requested to view what [redacted] purchased. [redacted] was reluctant to show the outfit however since it was Epstein's money that purchased the item, she pulled it out of the bag. Epstein asked her to try it on. [redacted] looked at [redacted] who told her "yeah, try it on." Feeling compelled to try the undergarment outfit on; she went to another room and put on the bra and panty set. She walked out to the living room where they were sitting, and modeled the suit. She then went back into the other room and changed back into her clothes. [redacted] returned into the room and told [redacted] she would be going home. [redacted] scheduled another day for [redacted] to return for massages with her.

[redacted] stated within that same week, she returned to meet with [redacted] and have a massage. [redacted] had told her that she would be unable to stay with her as she would be going on a bike ride with Epstein. [redacted] explained she could stay at the house and take advantage of the massage.

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[redacted] stated she met with an unknown massage therapist and had the table already set up in a guest room. [redacted] removed her clothing, leaving her panties on, and wrapped herself with a towel for the massage. [redacted] remembered that the door to the guest room was closed but not locked. As the therapist was working her back, the door was opened by Epstein and entered into the room. [redacted] was trying to conceal herself as Epstein was talking to her about his chiropractic session. Epstein told [redacted] turn over onto her back. [redacted] eventually turned over exposing her breasts to Epstein as he applied pressure on her shoulder and her waist. [redacted] stated Epstein "popped" her back. [redacted] removed her self from the table, got dressed and left the house [redacted] further stated [redacted] had attempted to call her on several occasions to invite her back to Epstein's house to which [redacted] replied "I'm busy." [redacted] advised she has not had contact with either [redacted] or Jeffrey Epstein. It should be noted that her mother, [redacted] was present during the interview. The interview was concluded and we thanked them her for their time.

**************************** N A R R A T I V E # 38 ***************************

NA Reported By: RECAREY, JOSEPH 1/31/06
Entered By.: ALTOMARO, NICKIE A. 1/31/06

On January 27, 2006, I made telephone contact with Christina Venero, at [redacted]. Venero is a licensed massage therapist who had frequented the home of Jeffrey Epstein. Ms. Venero has been unable to meet with me in Palm Beach County, and because she lives and works in Port St Lucie, a telephone interview was conducted. I explained to Ms. Venero that there was an on going investigation involving Jeffrey Epstein.

Venero stated she knows Epstein and has been employed by him for approximately three years. Epstein has paid Venero to perform Swedish Massages (Deep Tissue) on him and other guests. Venero explained that approximately three year ago she met Ghislaine Maxwell and Jeffrey Epstein through a mutual friend. Epstein and Maxwell were looking for a massage therapist. Venero stated since that time, she is notified when Epstein is coming to Palm Beach. Venero stated she comes to his house and provides the massage or massages. Venero explained she has also massaged his guests and assistants. Venero continued that she is paid $100.00 and hour for the massage.

I asked Venero if anything occurred during the massage that would have made her feel uncomfortable. Venero stated she only provided massages and that was it. She never was approached for anything else. I asked if Epstein ever asked her to rub his chest she stated she would not rub his chest as that is not part of her massage. Venero explained that she was not Epstein's type. The girls she would see at Epstein's house were very thin, beautiful and without tattoos. Venero explained she has several tattoos that are visible. Maxwell and Epstein have commented negatively about her tattoos previously when she has provided massages.

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Venero stated she only provided massages for Epstein and his associates and nothing happened during those massages. Venero stated as she does Swedish style massages, the patient is usually sore after the massages. I thanked her for her assistance and the interview was concluded at this time.

I received a facsimile from T-Mobile Cellular service on telephone number [redacted] which is assigned to David Rodgers, pilot for Mr. Epstein, who resides in Lake Worth. Rodgers' telephone number was dialed on several occasions by Sarah Kellen. A background on Rodgers indicated he has a valid FAA pilot license First Class for the Southern FAA Region. Rodgers has another historical FAA license for Airline Transport Pilot.

Investigation Continues.

***************************** N A R R A T I V E # 39 ***************************

NA Reported By: RECAREY, JOSEPH 2/14/06
Entered By.: ALTOMARO, NICKIE A. 2/16/06

On Friday, February 3, 2006, I had made arrangements to meet with [redacted] at the Palm Beach Police Station. At approximately 1:00pm, [redacted] and her friend, [redacted] arrived at the police station. During an interview with [redacted], she stated she met Epstein when she turned eighteen years old and was brought to Epstein's house to provide a massage. She advised this occurred on May of 2005. She advised Haley Robson had informed her if she wanted to provide a massage for $200.00. [redacted] agreed and was brought to Epstein's house to provide a massage. [redacted] stated she had been to the house on many occasions during the massage sessions. [redacted] also stated she would remove her clothing to provide the massage on Epstein. [redacted] advised Epstein would pay her $300.00 to rub his back, legs and chest. During the massages, Epstein would masturbate himself as she rubbed his chest. I asked her if Epstein ever touched her breasts during the massages. [redacted] replied, "Yes." I asked her if Epstein ever touched or massaged her vagina. [redacted] stated he had on several occasions. I asked her if he ever penetrated her with either his penis or any other objects. [redacted] stated that during a massage he inserted his fingers in her vagina as she massaged him. She stated this occurred one time only. [redacted] stated the massage would be over when Epstein would climax onto a towel. I asked [redacted] if she had any formal massage training to which she replied that she did not. [redacted] was then asked if she ever brought anyone to the house to "work." [redacted] stated she brought two people to the house. She advised she received money for bringing people to the house to "work." [redacted] stated she brought a girl named [redacted] and her friend [redacted] [redacted] was still waiting for [redacted] in the lobby of the police station. I thanked [redacted] for her time and her cooperation and escorted her to the lobby.

I asked Ms [redacted] if I could speak with her about this investigation. I

Case No. . . . . : 1-05-000368 (Continued)

brought her to the interview room and explained to her that I was conducting an investigation on Jeffrey Epstein and felt she may have information pertaining to the investigation. Ms [redacted] identified herself as [redacted] and resides in Wellington, Florida. She advised approximately a year ago she was brought to Epstein's house to provide a massage for money. [redacted] stated she needed to make money and felt it was a quick way to make some money. [redacted] stated she was brought to the house by [redacted] and was introduced to Epstein and his assistant. She was brought to his main bathroom and provided a massage. I asked her if she provided the massage naked. [redacted] stated she did. She rubbed Epstein's legs, back and chest. I asked [redacted] if Epstein touched her during the massage. She advised he did not, however he did masturbate himself as she rubbed his chest. Once he climaxed the massage was over. She was paid her money and left the area. [redacted] advised it occurred one time and she never returned to Epstein's house. The interview was concluded and [redacted] was escorted to the lobby.

I located a telephone number for [redacted] and attempted to contact her on several occasions. I called [redacted] and spoke with Ms. [redacted] who advised she would speak with me in Deerfield Beach where she resides. Due to a scheduling conflict, we were unable to meet. I informed her I would contact her to schedule another appointment to speak with her about this investigation. I have attempted to meet with her and make telephone contact with negative results.

On February 13, 2006, I met with David Rodgers at [redacted] in Lake Worth. Rodgers was identified as Epstein's pilot. I spoke with Rodgers who advised he has been employed with Epstein since 1991. He flies both planes for Epstein depending where he wants to fly to. Rodgers was asked about passengers in the plane he flies. Rodgers stated unless Epstein flew to his island off of St Thomas, there would be no way of knowing who the passengers were. I mentioned a recent flight to Ohio, where Rodgers flew to Ohio to pick up [redacted]. Rodgers stated he recalled flying on several occasions and did remember [redacted] Rodgers stated once he is in the cockpit, he does not know who the passengers are. When he prepares the passenger manifests, he lists Epstein and his assistants he knows by name, Sarah and Adrianna. Rodgers stated he would list either female or male passengers on the manifests only to keep a count on the passengers. Mrs. Rodgers came into the living room and recommended that her husband consult with an attorney. Mr. Rodgers agreed he would speak with the family attorney to inform him of this questioning. I explained to Mr. Rodgers that he was not the suspect in this investigation and ceased all questions. Based on the fact Rodgers could not advise who passengers were in the plane, I then left the area.

I attempted to locate [redacted] at [redacted] in Wellington. I left my business card for her to return my call. On February 14, 2006, at 12:06 pm, I received a call back from Ms. [redacted]

Case No. . . . . : 1-05-000368 (Continued)
on my voice mail. Ms [REDACTED] left her telephone number for a return call [REDACTED] I left her a message to return call.

Investigation Continues..

**************************** N A R R A T I V E # 40 **************************
NA Reported By: RECAREY, JOSEPH 2/21/06
Entered By.: ALTOMARO, NICKIE A. 2/22/06

On February 15, 2006, I made telephone contact with [REDACTED] who provided directions to where I could locate her. Det Caristo and I responded to [REDACTED] in Lake Park to meet with [REDACTED] [REDACTED] Upon my arrival, I met with [REDACTED] in the parking lot directly behind MAACO Auto Painting. She was advised I was there to speak with her about an ongoing investigation that concerned Jeffrey Epstein in Palm Beach. [REDACTED] stated she knows Epstein very well and did not want to speak with me about Mr. Epstein. She was very fond of Epstein and did not want to speak with me about anything concerning Jeffrey Epstein. I explained to her that she was seen at the house and I would like to speak with her. She stated she knew there was an investigation and that I had spoken with other people and therefore I should know what happened at Epstein's house. [REDACTED] ended the conversation and walked back into her boyfriends business, Blanton Automotive. Det Caristo and I left the area and returned to the police station.

Investigation continues.

**************************** N A R R A T I V E # 41 **************************
NA Reported By: RECAREY, JOSEPH 4/10/06
Entered By.: ALTOMARO, NICKIE A. 4/10/06

A Grand Jury Session was requested during the month of February 2006, in which all the girls that had been interviewed would have been called to testify before the Grand Jury to seek an indictment against Jeffrey Epstein. Due to subsequent meetings with the State Attorney's Office and Defense Attorney Alan Dershowitz the Grand Jury was postponed until a later time. Dershowitz had provided a package of material on the main victims in this case in which they appear on myspace.com and speak about alcohol use and some marijuana use. The State Attorney's Office wanted time to review the material.

I requested additional subpoenas from the State Attorney's Office in which I requested information from Dollar Rent a Car and Jet Aviation. The information requested from Dollar Rent a Car was for the rented vehicle by Alfredo Rodriguez while under the employ of Epstein for one of the victims. The other subpoena requested was for Jet Aviation for dates and times when Epstein's planes were in Palm Beach County.

I continued to research other names that were acquired either from interviews or intelligence gathered during the investigation. I

Case No. . . . . : 1-05-000368 (Continued)
located [redacted] in Royal Palm Beach. I responded to [redacted] [redacted] Royal Palm Beach. During the interview, [redacted] stated she knew I would be speaking with her. [redacted] stated she was first introduced to Epstein when she turned eighteen years old. [redacted] stated she was sure of her age as it was her senior year in [redacted] High School. She advised she was brought there to make money and was told she would have to provide a massage to this Palm Beach guy. She remembered she met Epstein and his assistant Sarah in the kitchen area. She stated she was taken by one of her friends, [redacted] She stated she went upstairs with Sarah while Epstein got ready for the massage. He exited his bathroom naked and [redacted] turned around. Epstein asked her if being naked offended her. [redacted] stated it made her uncomfortable. Epstein then put on a towel and lay on the table. [redacted] stated she rubbed his back and feet. She stated she had no massage training or experience. [redacted] stated during the massage, Epstein attempted to touch her buttocks. [redacted] pulled away as he touched her buttocks. She told him again she was uncomfortable with him touching her. Epstein then cut the massage short and became upset with her. Epstein paid her $200.00 for the massage and told her to leave the house. [redacted] never returned to the house. She did advise of one time she went with [redacted] however she waited in the car for [redacted] as she did not want to go into the house. At the conclusion of [redacted]'s visit with Epstein they left the area. [redacted] stated she had heard from other girls that have gone to the house that Epstein now required them to do the massage naked and allow him to touch them in their private areas for monies. The interview was concluded as [redacted] did not have any other information to provide.

I then learned from the original victim, [redacted] the defense attorney had learned of her identity. I spoke with the father of the victim, who stated there has been a private investigator on his house photographing his family and chasing visitors who come to the house. He provided a Florida License of [redacted] This vehicle is registered to Ivan Robles of West Palm Beach. Robles is a private investigator intern who is licensed by the state. I informed the State Attorney's Office of the above information.

I received the Grand Jury subpoenas to be delivered to three victims for a Grand Jury session to be held on April 18, through April 20, 2006.

Investigation continues.

**************************** N A R R A T I V E # 42 **************************
NA Reported By: RECAREY, JOSEPH 4/14/06
Entered By.: ALTOMARO, NICKIE A. 4/18/06

The Grand Jury Subpoenas were personally served to the individuals they were issued to. On April 5, 2006, at approximately 7:30 p.m., I personally served the parents of [redacted] who had informed me that the private investigators were still photographing the family. On April

Case No. . . . : 1-05-000368 (Continued)
10, 2006, at approximately 2:30 p.m., I served [redacted] at her residence in Royal Palm Beach. The subpoena was given to her mother, [redacted]

I learned through one of the victims [redacted] that she was personally contacted through a source that has maintained contact with Epstein. The source assured [redacted] she would receive monetary compensation for her assistance in not cooperating with law enforcement. AH also stated she was told, "Those who help him will be compensated and those who hurt him will be dealt with." I told [redacted] that tampering with a witness/victim is an arrestable offense and very serious. I asked her who approached her during this encounter. [redacted] originally was reluctant to provide the name of the person who approached her to offer her not to testify because she felt they were still friends.

On April 11, 2006, Det Dawson and I traveled to Tallahassee, Florida and met with the victim, [redacted] [redacted] identified [redacted] W/F, [redacted], as the person who approached her in Royal Palm Beach while she was home during Spring Break in March 2006. [redacted] also stated she did not want to pursue the intimidation charges on [redacted]. [redacted] was concerned that the defense attorney was given a copy of the report as certain things she had told me in confidence were repeated to her by [redacted]. Prior to our departure, the victim was given a copy of her subpoena for the Grand Jury which was scheduled to commence April 18, 2006.

Upon our return from Tallahassee, I notified the State Attorney's Office of what was told to me. I also notified them that the subpoenas were delivered to the witnesses and they would be calling for arrangements for the date and time needed for the Grand Jury. I spoke with ASA Weiss and informed her of the possible intimidation by the defense.

On April 13, and April 14, 2006 I attempted contact on several occasions with ASA Weiss and ASA Belohlavic to ascertain when the victims needed to report for Grand Jury testimony. Messages were left on their voicemail. On April 17, 2006, during the hours of 9:00 am and 11:30 am, I again left messages for ASA Weiss and ASA Belohlavic for either of them to return my call as I had not heard from the State Attorney's Office as to the time and date of the Grand Jury.

At approximately 12:30 pm, I went to the State Attorney's Office and located ASA Weiss and ASA Belohlavic in their offices. I entered ASA Belohlavic's office who informed me that she was going to return my call. She explained that an offer was made to the defense, Atty Guy Fronstin and Atty Alan Dershowitz. The offer is 1 count of Agg Assault with intent to commit a felony, five years probation, with adjudication withheld. Epstein would have to submit to psychiatric/sexual evaluation and no unsupervised visits with minors. When asked about the all the other victims, ASA Belohlavic stated that was the only offer made as to one victim, [redacted] ASA Belohlavic cell phone rang and went to voice mail. She checked her voice mail and played the message on speaker. The caller identified himself as

Case No. . . . . : 1-05-000368 (Continued)

Atty Guy Fronstin and acknowledged the deal made between them. Fronstin stated in the message, he spoke with his client, Jeffrey Epstein, and agreed to the deal. Fronstin asked to call off the grand jury as they would accept this deal. Belohlavic stated a probable cause would be needed to book Epstein in the county jail and would let me know as to when it would be needed. I explained my disapproval of the deal and not being consulted prior to the deal being offered. However I expressed that was only my opinion and the final approval would come from the Chief of Police. She explained to have Chief Reiter call Barry Krisher about the deal. I left the area and returned to the police station where I briefed the Chief about the deal offered.

I checked my voice mail messages and discovered a message from [REDACTED] stepmother for the victim [REDACTED] She was calling because the State Attorney's Office still had not returned any of her calls as to when they are needed for this case. I then called ASA Belohlavic's office and left messages for her to call the victims on this case and explained to them what the State Attorney's Office had done.

On April 17, 2006, at approximately 4:30 pm, State Attorney Investigator Tim Valentine called to officially notify me of the cancellation of the Grand Jury. He requested I contact the victims that had been served to appear, to notify them of the cancellation. I advised Valentine that as this Grand Jury session was called based on the State Attorney's Office decision to have the victims heard by the Grand Jury that I felt it was the States Attorney's Office responsibility to contact the victims and advise them of the reason they were no longer needed.

**************************** N A R R A T I V E # 43 **************************
NA Reported By: RECAREY, JOSEPH 5/04/06
Entered By.: ALTOMARO, NICKIE A. 5/04/06

As I had not received any contact from anyone at the State Attorney's Office, on May 1, 2006, I prepared three arrest warrant requests and submitted them to the State Attorney's Office. The packages were delivered to the Crimes against Children Unit in care of ASA Lana Belohlavek. Jeffrey Epstein's arrest warrant was requested for 4 counts of Unlawful Sexual activity with certain minors and one count of Lewd and Lascivious Molestation. Sarah Kellen, Epstein's assistant's, arrest warrant request was for 4 counts of Principal in the 1st degree Unlawful Sexual activity with certain minors and one count of Principal in the 1st degree Lewd and Lascivious Molestation. Haley Robson's arrest warrant request was for Lewd and Lascivious Acts on a victim under 16 years of age. The receipt of delivery was signed and brought back to the records division at the police department.

On May 3, 2006, at approximately 2:54 pm, I received a telephone call from ASA Daliah Weiss on my cellular telephone. ASA Weiss advised she

Case No. . . . : 1-05-000368 (Continued)

has been taken off the Jeffrey Epstein case because her husband is employed with Attorney Jack Goldberger. Attorney Goldberger is the attorney of record for Jeffrey Epstein. His previous attorney, Guy Fronstin, has been fired from representation. ASA Lana Belohlavek has been assigned the case. ASA Weiss stated she can no longer speak about the Epstein case with me. I thanked her for her telephone call. ASA Weiss further stated that ASA Belohlavek would be calling me.

*************************** N A R R A T I V E # 44 **************************

NA Reported By: RECAREY, JOSEPH 5/15/06
Entered By.: ALTOMARO, NICKIE A. 5/15/06

On May 10, 2006, information was received that Epstein's associate, Leslie Wexner, The Limited Inc, CEO's, plane had arrived in West Palm Beach, PBIA. The plane, a Gulfstream 4 bearing a N900LS registration, was on the tarmac at Galaxy Aviation. As Epstein had recently acquired the services of a new attorney, and the fact that Epstein's house is currently under remodeling, it was believed that Epstein may be in Palm Beach. I conducted physical surveillance at the residence, 358 El Brillo Way. I observed a large construction crew conducting remodeling at the house. The contractor, David Norr, was observed driving a Ford Explorer, white in color. The vehicle has a Florida registration of F30QQF. Norr left Epstein's house and traveled north on County Road. Det Caristo and I conducted surveillance on Norr. Norr traveled to several construction sites and checked on certain jobs. Surveillance was discontinued on Norr and Det Caristo and I traveled to Galaxy Aviation. I observed the white plane with a blue stripe along the body and tail of the plane; the tail number was visible on the bottom of the tail, closer to the body of the plane. We maintained visual surveillance on the plane until 4:57 p.m., when a caravan of Cadillac Escalades drove onto the tarmac. We observed several people exit the vehicles and discovered that they were part of the executive team for Limited Inc. The executives were in Palm Beach County for an executive meeting for the day. They arrived in Palm Beach County on May 9, 2006 at 9:30 pm and were scheduled to leave on the 10th at 5:00 pm.

On May 12, 2006, I met with ASA Lana Belohlavek at the State Attorney's Office. She explained that her boss, Barry Krischer, was requesting this case be taken to the Grand Jury again. I explained to her I had requested arrest warrants for Jeffrey Epstein, Sarah Kellen, and Haley Robson. I asked that she either issue the warrants or direct file, as so much time has elapsed since the original request to the Grand Jury. I explained that the Palm Beach Police Department had concluded the case in December of 2005 and has been waiting for the case to go forward. Belohlavek stated the original offer was again offered to the new defense attorney. She was waiting for their answer by Friday May 19, 2006. She stated she would advise me of the answer.

*************************** N A R R A T I V E # 45 **************************

NA Reported By: RECAREY, JOSEPH 6/05/06

Case No. . . . : 1-05-000368 (Continued)
Entered By.: ALTOMARO, NICKIE A. 6/06/06

On May 22, 2006, I received several phone calls throughout the day from Mr. who stated he had been followed aggressively by a private investigator. Mr. stated that as he drove to and from work and running errands throughout the county, the same vehicle was behind him running other vehicles off the road in an attempt not to lose sight of Mr. vehicle.

I explained to him as Mr. Epstein had retained new legal council it was possible it would be new private investigators following him to observe his daily activities. I also explained to him that there was a meeting scheduled with ASA Lana Belohlavek and Attorney Jack Goldberger at Mr. Krischer's office scheduled on June 1, 2006 at 9:00 am. I attempted to call ASA Lana Belohlavek to inform her of the private investigators following Mr. however; she was on her vacation during the week of May 22 through May 30 2006.

On May 23, 2006, I received other phone calls from Mr. and Mrs. who advised they were able to acquire the private investigators license plate information. The subject following them was again driving very aggressively and caused Mrs. to run off the road. Mrs. stated the vehicle is a green Chevy Monte Carlo bearing Florida tag . The vehicle is registered to Zachary Bechard of Jupiter Florida. Bechard is employed with Candor Investigations from Jupiter, Florida. Bechard is a licensed Private Investigator in the State of Florida.

Since the discovery of the threat made against one of the victims in this case I requested subpoenas for all calls made to and received from during the month of March 2006 for her cell phone and home phone. I had confirmed with Florida State University the exact dates of Spring Break for 2006. The Spring Break was from March 4, 2006 through March 12, 2006. I received a subpoena from Sprint/Nextel with all calls made during the month of March 2006. I reviewed the 989 calls made and received during the month of March 2006. I observed on March 7, 2006, made and received thirty five calls during that day.

Date	Time	Seconds	In/Out	To/From
7-Mar-06	11:03 AM	492	Outbound	561XXXX
7-Mar-06	11:16 AM	6	Inbound	561XXXX
'-Mar-06	11:22 AM	887.2	Inbound	561XXXX
·Mar-06	11:37 AM	48	Outbound	
Mar-06	11:39 AM	28.2	Inbound	
ar-06	12:02 PM	727.2	Inbound	

table reflects the date of the calls, time of day (EST), duration

Case No. . . . : 1-05-000368 (Continued)

of call in seconds, inbound or outbound calls and calls made to or from [REDACTED]s phone. On March 7, 2006, at 11:03 am, [REDACTED] made a call to the victim [REDACTED] which lasted 492 seconds (8 minutes and 2 seconds). The victim then returned the call at 11:16 am which lasted 6 seconds. The victim then made contact with [REDACTED] at 11:22 am for 877.2 seconds (14 minutes and 6 seconds). These sequences of calls were consistent with what the victim had described to me on the date of the intimidation. Immediately after speaking with the victim, [REDACTED] makes a call to Sarah Kellen, Epstein's assistant, which lasts for forty-eight seconds. A call is then immediately received, a telephone number registered to a Corporation affiliated with Jeffrey Epstein located at 457 Madison Ave in New York. An extensive computer check revealed 457 Madison Ave is a business address in which Epstein has his corporations assigned to. Epstein had corporation attorney, Darren Indyke, register the businesses and register himself as an agent. I also observed Epstein has his El Zorro Ranch Corporation, New York Strategy Group, Ghislaine Corporation, J Epstein and Company and the Financial Strategy Group registered to this same address. Finally, a third call is received by [REDACTED] at 12:02 pm from the same corporate number which lasts 12 minutes and 1 second. It should be noted that there is no further contact with either the victim during the month of March or April of 2006. I also noted that there was no further contact with Sarah Kellen or Jeffrey Epstein during the remainder of the month of March or April 2006.

On June 1, 2006, ASA Lana Belohlavek telephoned me to inform me of the meeting that occurred with Atty. Jack Goldberger and her reference this case. She advised she would make her determination on whether to file on this case or not by Monday June 5, 2006.

Inv Continues.

*************************** N A R R A T I V E # 46 **************************

NA Reported By: RECAREY, JOSEPH 7/12/06
Entered By.: ALTOMARO, NICKIE A. 7/12/06

On June 29, 2006, I had spoken to ASA Lana Belohlavic who informed me that the case would be sent to the Grand Jury for charges. She informed me that the grand jury would convene on July 19, 2006 to hear the Epstein case. Belohlavic stated State Attorney Barry Krisher made the determination to go the Grand Jury to hear the case.

On July 12, 2006, I spoke with Mrs. [REDACTED] mother of the victim, [REDACTED] who inquired about the status of the case. I explained to her that I was told we would be going to the Grand Jury during the week of July 19, 2006. She stated she had not been contacted as of yet by the State Attorney's Office for any information. I provided her with the telephone numbers to the State Attorney's Office.

Investigation continues...

* * * * * * * * * * * * * * * * * END OF REPORT * * * * * * * * * * * * * * * * *

EXHIBIT 40
(Filed Under Seal)

amazon.com.

amazon.com. Amazon.com
1850 Mercer Rd.
Lexington, KY 40511

Jeffrey Epstein
358 El Brillo Way
Palm Beach, Florida 33480
USA

Billing Address:
Jeffrey Epstein
358 El Brillo Way
Palm Beach, Florida 33480
USA

Shipping Address:
Jeffrey Epstein
358 El Brillo Way
Palm Beach, Florida 33480
USA

rbrd57708/-3-/next/2436223 SORTExtFastTrack

Your order of September 4, 2005 (Order ID 103-1737820-4508648)

Qty.	Item	Item Price	Total
	IN THIS SHIPMENT		
1	SM 101: A Realistic Introduction Wiseman, Jay --- Paperback (** C-2 **) 0963976389	$16.47	$16.47
1	SlaveCraft: Roadmaps for Erotic Servitude--Principles, Skills and Tools Baldwin, Guy --- Paperback (** C-2 **) 1881943143	$15.95	$15.95
1	Training With Miss Abernathy: A Workbook for Erotic Slaves and Their Owners Abernathy, Christina --- Paperback (** C-2 **) 1890159077	$11.95	$11.95

Subtotal	$44.37
Shipping & Handling	$24.46
Order Total	$68.83
Paid via Amex	$68.83
Balance due	$0.00

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EXHIBIT 41
(Filed Under Seal)

Date 1995 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE			
17	G1159B	N908JE	CMH	PBI		779	JE		2	0		
20	"	"	PBI	TEB		780	JE, AS		2	2		
21	"	"	TEB	PBI		781	JE, AS, EVA, GLENN, BABY, 1 FEMALE		2	4		
26	"	"	PBI	TEB		782	GM, MATT GROENING, AS, ALAN GREENBERG, MRS GREENBERG, EVA, GLENN, BABY, NANNY		2	4		
29	"	"	TEB	CMH		783	JE, SOPHIE BIDDLE, 3 MALES		1	3		
30	"	"	CMH	PBI		784	JE, SOPHIE BIDDLE	1/1	2	0		
DEC 3	"	"	PBI	TEB		785	JE, SOPHIE BIDDLE		2	2		
5	"	"	TEB	PBI		786	JE, AS		2	3		
1996 JAN 1	"	"	PBI	TEB		787	JE, GM, GWENDOLYN BECK, GHISLAINE SCHUMI, DAVID ANTON		2	1		
4	"	"	TEB	PBI		788	JE, SOPHIE BIDDLE		2	5		
9	"	"	PBI	TEB		789	JE, AS, SOPHIE BIDDLE		2	3		
12	"	"	TEB	PBI		790	JE, GM, DEBORAH		2	3		
20	"	"	PBI	SAF		795	JE, GM	1/1	4	0		
21	"	"	SAF	LAX		796	JE, GM	1/1	2	0		
23	"	"	LAX	TEB		797	JE		4	4		
25	"	"	TEB	PBI		798	JE		2	3		
28	"	"	PBI	CMH		799	JE, GM	1/1	2	0		
28	"	"	CMH	TEB		800	~~GM~~ JE, GM		1	0		
31	"	"	TEB	PBI		801	JE		2	3		
							Page Total	4/4	44	2		
							Amount Forward	5822/5593	6558	6		
							Total to Date	5826/5597	6602	8		

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

DEPOSITION EXHIBIT 1 6-3-16 KAW PENGAD 800-631-6989

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
FEB 5	G1159B	N908JE	PBI	TNCM		802	JE, GM	1/1	2	4
7	G1159B	"	TNCM	TEB		803	JE,GM	1/	4	0
9	"	"	TEB	PBI		804	JE, GM, SHARON REYNOLDS		2	1
12	"	"	PBI	TEB		805	JE, GM, SHARON REYNOLDS	1/1	2	1
15	"	"	TEB	BCT		806	JIMMY CAYNE, MRS. CAYNE, ALLISON CAYNE WARREN, KARL [illegible], SOPHIE BIDDLE, JAY		2	4
19	"	"	BCT	TEB		807	JIMMY CAYNE MRS. CAYNE, ALLISON CAYNE WARREN, SOPHIE, +1 PAX	1/	2	3
28	"	"	TEB	PBI		808	JE, GM, AS, SOPHIE BIDDLE		2	2
MAR 4	"	"	PBI	TEB		809	JE, GM, AS, SOPHIE BIDDLE, MARIA		2	4
8	"	"	TEB	PBI		810	JE, GM, AS, [illegible] 1 FEMALE	1/1	2	6
11	"	"	PBI	TEB		811	JE, GM, AS, CHRISTINE, 1 FEMALE		2	3
15	"	"	TEB	PBI		812	JE, GM, AS, 1 FEMALE		2	1
18	"	"	PBI	CMH		813	JE, GM, AS, CLAIRE HAZEL, 1 FEMALE	1/1	2	1
18	"	"	CMH	TEB		814	JE, GM, AS			
22	"	"	TEB	PBI		815	JE, FRANCES, SOPHIE BIDDLE, EVA, + 4 PAX		2	3
24	"	"	PBI	TEB		816	JE, EVA, BABY, +3 PAX		2	3
26	"	"	TEB	VNY		817	JE		5	5
29	"	"	VNY	SAF		818	JE		1	5
APR 8	"	"	PBI	TEB		821	JE, GM, AS, EVA, GLENN, CELINA, NANNY		2	1
12-?	CESSNA 421B SIMULATOR	INITIAL TRAINING					INSTRUMENT COMPETENCY RIDE		10	0
							Page Total	6/4	53	8
							Amount Forward	5826/5547	6602	8
							Total to Date	5832/5551	6656	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR 000002

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		...and Class SEL
APR 22	G1159B	N908JE	PBI	TEB		828	JE, GM		2	2	
26	"	"	TEB	PBI		829	JE, GM. 3 PAX	1/1	2	3	
29	"	"	PBI	TEB		830	JE, GM, MATT GRIPPE, 1 MALE, 2 FEMALE	1/1	2	3	
MAY 2	"	"	TEB	EIDW		831	JE, ELIZABETH JOHNSON, J. DUBKIN, ELINCLAS, E. WAGDALL, A. TEAL, S. TEAL, OPAL	1/1	6	0	
3	"	"	EIDW	EIWF		832	CATHERINE EINGLAS, ELIZABETH WALKER, A. TEAL, S. TEAL, O. TEAL	1/1		5	
3	"	"	EIWF	LFPB		833	JE, PAMELA JOHANNOFF	1/1	1	3	
6	"	"	LFPB	LSGG		834	JE, PAMELA JOHANNOFF	1/1		7	
6	"	"	LSGG	EINN		835	JE, PAMELA JOHANNOFF	1/	1	8	
6	"	"	EINN	TEB		836	JE, PAMELA JOHANNOFF		6	5	
8	"	"	TEB	MDLR		837	JE, GM, KATHERINA KOTZIG	1/1	3	3	
9	"	"	MDLR	MBGT		838	JE, GM, KATHERINA KOTZIG	1/1		7	
9	"	"	MBGT	PBI		839	JE, GM, KATHERINA KOTZIG	1/	1	5	
13	"	"	PBI	CMH		840	JE, GM, AS, 2 FEMALES	1/1	2		
13	"	"	CMH	PEB		841	JE, GM, AS, 1 FEMALE		1	1	
17	"	"	TEB	PBI		842	JE		2	1	
20	"	"	PBI	TEB		843	JE JIM WALKER	1/1	2	2	
22	"	"	TEB	SAF		844	JE, GM JIM WALKER	1/	4	0	
24	"	"	SAF	PBI		845	JE, GM JIM WALKER	1/	3	1	
27	"	"	PBI	TEB		846	JE, GM, ANKIE		2	3	
							Page Total	14/10	46	0	2116
							Amount Forward	5832/5601	6656	6	211
							Total to Date	5846/5611	6702	6	

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE				...and Class SEL	MEL
MAY 30	G1159B	N908JE	TEB	PBI		847	JE		2.0					
JUN 2	"	"	PBI	TEB		848	JE, PAULA EPSTEIN, ALLISON, SHARGG, TEFFANY	1/1	2.5					2
5	"	"	TEB	PBI		849	JE, ALLISON, CHERGE, COLOMA	1/1	2.3					2
18	"	"	PBI	TEB		850	NO PASSENGERS JIM WARREN	1/1	2.2					2
19	"	"	TEB	PBI		851	JE, GM		2.1					2
24-27	"	SIMULATOR	SAV	SAV			RECURRENT TRAINING		6.0					2
JUL 9	"	N908JE	SAF	CMH		860	JE, GM	1/1	2.5					6
10	"	"	CMH	TEB		861	JE, GM, IRA ZICHERMAN	1/1	1.2					2
12	"	"	TEB	MVY		862	JE	1/1	.6					1
12	"	"	MVY	TEB		863	JE		.9					
12	"	"	TEB	PBI		864	JE, GM		2.4					2
15	"	"	PBI	TEB		865	JE, GM	1/1	2.3					2
16	"	"	TEB	PBI		866	JE, CELINA		2.0					2
17	"	"	PBI	SAV		867	OPS 1 INSPECTION	1/1	.9					
AUG 3	"	"	SAV	GWR		868	OPS 1 INSPECTION	1/1	1.7					1
12	"	"	PBI	TEB		873	JE, GM, ANDY, MANDY, RALPH	1/1	2.3					2
14	"	"	TEB	TVC		874	JE, GM	1/1	1.5					1
16	"	"	TVC	TEB		875	JE, GM	1/	1.4					1
18	"	"	TEB	MVY		876	JE, DAVID ROTHMAN, ELLIOT TAYLOR 2 PAX	1/1	.6					
							Page Total	13/12	37.5					3
							Amount Forward	5846/5611	6702.6				2116	5458
							Total to Date	5859/5623	6740.1				2116	5462

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR 000004

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE				...and Class SEL
AUG 18	G1159B	N908JE	MVY	TEB		877	JE, DAVID ROTHMAN, FELICIA JAYLOR (?)	1/1		9			
18	"	"	TEB	PBI		878	JE, CELINA MIDDLEFART	1/1	2	2			
21	"	"	PBI	JAN		879	JE, GM, ROBIN PLANT	1/1	1	7			
21	"	"	JAN	SAF		880	JE, GM, ROBIN PLANT	1/1	1	9			
21	"	"	SAF	PBI		881	JE, GM, ROBIN PLANT	1/1	3	3			
26	"	"	PBI	TEB		882	JE, GM	1/	2	3			
SEP 5	"	"	TEB	BED		883	JE	1/1		6			
7	"	"	BED	PVD		884	JE	1/1		3			
7	"	"	PVD	CMH		885	JE	1/1	1	5			
7	"	"	CMH	DCA		886	JE, 1 MALE, 1 FEMALE	1/1		7			
8	"	"	DCA	CMH		887	JE, JOHN GLENN, ALAN DERSHOWITZ	1/1		8			
8	"	"	CMH	TEB		888	JE, ALAN DERSHOWITZ		1	1			
9	"	"	TEB	BOS		889	ALAN DERSHOWITZ	1/1		6			
9	"	"	BOS	TEB		890	RETURN TO TEB	1/1		8			
12	"	"	TEB	PBI		891	JE, CELINA MIDDLEFART		2	3			
18	"	"	PBI	TEB		892	JE, GM	1/1	2	3			
20	"	"	TEB	PBI		893	JE, GM	1/1	2	1			
23	"	"	PBI	BED		894	JE, GM	1/1	2	6			
23	"	"	BED	TEB		895	JE, GM			6			
							Page Total	16/15	28	6			
							Amount Forward	5859/5623	6740	1			2116
							Total to Date	5875/5638	6768	7			2116

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000005

Date 1996 SEP	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE				
26	G1159B	N908JE	TEB	CMH		896	JE	1/1	1	2			
26	"	"	CMH	PBI		897	JE		1	9			
OCT 6	"	"	PBI	TEB		9[illegible]	JE, GM, DIDIER	1/1	2	4			
10	"	"	TEB	PBI		902	JE		2	5			
14	"	"	PBI	TEB		903	JE, 1 FEMALE	1/1	2	4			
15	"	"	TEB	CMH		904	TO CMH FOR PICK-UP	1/1	1	2			
15	"	"	CMH	TEB		905	JE, DARREN, IRD ZIGERMAN, JEFF SCHANTZ	~~1/1~~	1	2			
19	"	"	TEB	PBI		906	JE, DIDIER AZADUMEC	1/1	2	3			
22	"	"	PBI	TEB		907	JE, GM, DIDIER CAZAUDUMEC	1/1	2	3			
24	"	"	TEB	SAF		908	JE, GM, LARRY		4	1			
25	"	"	SAF	PBI		909	JE, GM, SHANNON	1/	[illegible]	[illegible]			
27	"	"	PBI	TEB		910	JE, GM, JOE PASACOW, SHARON	1/	2	4			
30	"	"	TEB	DCA		911	JE, ANDY STEWART, LESLIE GELB BRIAN MATTHES, LESTER POLLOCK, STEPHEN RUBINS	1/1		6			
30	"	"	DCA	TEB		912	JE, ANDY STEWART, LESLIE GELB, 3 PAX	1/1		6			
31	"	"	TEB	PBI		913	JE, GM, DIDIER CAZAUDUMEC		2	2			
NOV 4	"	"	PBI	TEB		914	JE, GM, DIDIER CAZAUDUMEC	1/1	2	5			
7	"	"	TEB	PBI		915	JE, SOPHIE, JEFF SCHANTZ FAMILY (4) EVA, GLENN, CHILD, NANNY, IMALG, [illegible]		2	2			
11	"	"	PBI	TEB		916	JE, SOPHIE, [illegible], JEFF SCHANTZ FAMILY (4) EVA, CHILD, NANNY, NADIA, RUSS HARRIS		2	2			
15	"	"	TEB	CMH		917	JE, GM, JEFF SCHANTZ, DARREN, RUSS KIPPES		1	3			
							Page Total	11/9	38	7			
							Amount Forward	5875/5638	6768	7			
							Total to Date	5886/5647	6807	4			

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1996	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
NOV 15	G1159B	N908JE	CMH	PBI		918	JE, GM, CLAIR, RUSS KIPPES		2	1
17	"	"	PBI	BED		919	JE, GM, EVA & GLENN DUBIN, BABY, NANNY	1	2	6
17	"	"	BED	TEB		920	GM, EVA & GLENN DUBIN, BABY, NANNY			6
21	"	"	TEB	PBI		921	GM, JE, DIDIER CAZAUDUMEC, 2 AUNTS, DAVID ROTH, 2 ELMOBLES		2	2
28	"	"	PBI	LZU		922	JE, GM, 2 AUNTS, PAULA EPSTEIN	1	1	3
28	"	"	LZU	PBI		923	JE, GM	1	1	2
30	"	"	PBI	ABY		924	JE, GM	1	1	1
30	"	"	ABY	LZU		925	JE, GM			5
30	"	"	LZU	PBI		926	JE, GM, 2 AUNTS, PAULA EPSTEIN, MARK & KAREN EPSTEIN		1	3
DEC 2	"	"	PBI	TEB		927	JE, GM, MARK & KAREN EPSTEIN, 2 AUNTS, [illegible], GANA, BABY, GWENDOLYN BECK, JDG, [illegible]	1	2	3
4	"	"	TEB	PBI		928	JE, DIDIER CAZAUDUMEC, GWENDOLYN BECK	1	2	3
9	"	"	PBI	FTK		929	JE, GM, DIDIER CAZAUDUMEC	1	2	
9	"	"	FTK	TEB		930	JE, GM, DIDIER, NATHAN MYHRVOLD, BRAN	1		6
12	"	"	TEB	PBI		931	JE, JIMMY CAYNE, PAT CAYNE, EVA DUBIN, GLENN DUBIN, EVA'S NANNY		2	2
20	"	"	PBI	TIST		932	JE, GM, GWENDOLYN BECK, RUBEN PLANS	1	2	3
23	"	"	TIST	PBI		933	JE, GM, GWENDOLYN BECK, RUBEN PLANS	1	2	4
1997 JAN 5	"	"	PBI	EWR		934	JE, GM, DONALD TRUMP, MARK EPSTEIN, EVA, GLENN, CELINA DUBIN, DIDIER	1	3	1
11	"	"	EWR	TIX		935	JE, NATHAN MYHRVOLD, ALAN & [illegible] DERSHOWITZ, CELINA MIDELFART, [illegible]	1	2	3
11	"	"	TIX	PBI		936	NO PASSENGERS - RETURN WITH 4E	1		4
							Page Total	13/9	33	9
							Amount Forward	5886 5647 5899	6807	4
							Total to Date	5655	6841	3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

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CONFIDENTIAL DR_000007

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... ADDRLAND	
JAN 21	GIIB	N908JE	PBI	TEB		937	JE, GM, KAREN		2	2
24	"	"	TEB	TNCM		938	JE, GM, CLAIRE HAZEL, AMANDA	1/1	3	4
25	"	"	TNCM	PBI		939	JE, GM, CLAIRE HAZEL, AMANDA	1/1	2	8
29	"	"	PBI	TEB		940	JE, GM, GWENDOLYN BECK	1/1	2	1
30	"	"	TEB	PBI		941	JE, CELENA MIDDLEBAREF, ANTHONY BARRETTS, GWENDOLYN BECK, KEPRIER		2	4
FEB 2	"	"	PBI	TEB		942	JE, CELENA MIDDLEBARF, ANTHONY, DONNA GABRIELLA ROBREST, JOEL PASCHLOW		2	2
2	"	"	TEB	SAV		943	TO SAV FOR GEAR CHANGE, GEAR TRAVEL EXTENSION RUDDER ACTUATOR		1	7
13	"	"	SAV	TEB		944	NO PASSENGERS.	1/1	1	5
13	"	"	TEB	PBI		945	JE, GM, SOPHIE BIDDLE, RUBEN FLANT ANSON, EVA, CELENA, AVERY IMAN		2	5
17	"	"	PBI	TEB		946	JE, GM, GLEN, EVA, CELENA, DUBIN, LYNN, BEN FORESTER	1/	2	2
21	"	"	TEB	PBI		947	JE, CELENA MIDDLEBART, ALLISON		2	7
23	"	"	PBI	TEB		948	JE, CELENA, JOJO, LYN, 2 KIDS FONTANILLA, BOB, ALLISON, SOPHIE, EMILY KERNEY	1/	2	2
25	"	"	TEB	PBI		949	JE, GM, DONNA, GEORGE CAZDUDINEC		2	2
MAR 1	"	"	PBI	SAF		950	JE, GM	1/1	3	6
2	"	"	SAF	SJC		951	JE, GM	1/	2	2
3	"	"	SJC	TEB		952	JE, GM	/1	4	3
8	"	"	TEB	PBI		953	JE, GM, CLAIRE HAZEL		2	2
10	"	"	PBI	CMH		954	JE, CLAIRE HAZEL	1/1	2	0
10	"	"	CMH	VNC		955	JE, PAMELA STEVENS	1/	2	0

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	Aircraft Category	
Page Total	16/7	45	9
Amount Forward	5894 / 5655	6841	3
Total to Date	5909 / 5662	6887	2

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CONFIDENTIAL DR_000008

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAR 10	G1159B	N908JE	VNC	PBI		956	JE			4
15	"	"	PBI	DCA		957	JE, CELINA MIDELFART	1/1	1	7
15	"	"	DCA	IAD		958	REPOSITION FOR CURFEW			2
15	"	"	IAD	PBI		959	JE, CELINA MIDELFART		2	0
24	"	"	PBI	TEB		960	JE, GM, SUZANNA, JOEL PASHCOW, 1 FEMALE	1/1	2	3
27	"	"	TEB	PBI		961	JE, GM, DIDIER CAZAUDUMEC		2	1
30	"	"	PBI	SAF		962	JE, GM, DIDIER CAZAUDUMEC		3	7
APR 2	"	"	SAF	CMH		963	JE, GM, DC	1/1	2	4
2	"	"	CMH	TEB		964	JE, GM, DC		1	1
10	"	"	TEB	PBI		965	JE, DC, DONNA, 2 FEMALES, 1 MALE		2	2
15	"	"	PBI	DCA		966	JE, GM, DC, MANDY, GWENDOLYN BECK, DEIDRE, KATHLEEN ENA	1/1	2	0
15	"	"	DCA	TEB		967	JE, DC, GWENDOLYN BECK, LYNN			
17	"	"	TEB	PBI		968	JE, GM, DC, EVA, GLENN, CELINA, GORDON, MARY, 2 NANNYS, GWENDOLYN BECK, FELICITY TAYLOR, 1 FEMALE	1/1	2	4
21	"	"	PBI	TEB		969	JE, DC, MANDY, LISA, 1 MALE	1/1	2	2
21	"	"	TEB	BED		970	JE	1/1		5
21	"	"	BED	TEB		971	JE			7
22	"	"	TEB	PBI		972	JE		2	3
27	"	"	PBI	TEB		973	JE, CELINA MIDELFART	1/1	2	4
MAY 2	"	"	TEB	EGGW		974	JE, GM	1/1	6	5

I certify that the statements made by me on this form are true.

	Number of Landings	AIRPLANE	
Page Total	9/9	37	8
Amount Forward	5909 / 5662	6887	2
Total to Date	5918 / 5671	6925	0

Pilot's Signature David Rodgers

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Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE
MAY 5	G1159B	N908JE	EGGW	LSGG		975	JE	1/1	1 3
5	"	"	LSGG	LFPB		976	JE	1/1	7
6	"	"	LFPB	CYJT		977	JE, GM	1/1	5 6
6	"	"	CYJT	TEB		978	JE, GM	1/1	2 2
9	"	"	TEB	SAF		979	JE, GM, NADIA		3 9
12	"	"	SAF	VNY		980	JE	1/1	1 5
14	"	"	VNY	SAF		981	JE, SOPHIE BIDDLE	1/1	1 5
15	"	"	SAF	DFW		982	JE, GM, SOPHIE BIDDLE, JACK ROBERTSON	1/1	1 2
15	"	"	DFW	PBI		983	JE, SOPHIE BIDDLE	1/1	2 0
23	"	"	PBI	JFK		984	REPOSITION TO JFK		2 2
24	"	"	JFK	PBI		985	JE, CELINA MIDELFART, GINGER SOUTHGATE	1/	
JUN 1	"	"	PBI	TEB		986	JE, MANDY	1/1	2 1
5	"	"	TEB	PBI		987	JE, GM, DIDIER		2 4
9	"	"	PBI	TEB		988	JE, GM	1/1	2 3
21	"	"	TEB	MVY		989	JE, LYNN FORESTER, HEATHER MANN, RUSS KIPPES	1/1	6
21	"	"	MVY	PBI		990	JE, HEATHER MANN, RUSS KIPPES		2 4
23	"	"	PBI	CMH		991	JE, HEATHER, RUSS KIPPES	1/1	2 1
23	"	"	CMH	TEB		992	JE, RUSS KIPPES		1 1
27	"	"	TEB	PBI		993	JE, GM, RUSS KIPPES		2 1
							Page Total	13/13	39 3
							Amount Forward	5918 / 5671	6925 0
							Total to Date	5931 / 5684	6964 3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

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Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
JUL 1	G1159B	N908JE	PBI	TEB		994	JE, GM, PAULA EPSTEIN	1/1	2	5
10	"	"	CMH	SAF		999	JE, DIDIER	1/1	3	0
16	"	"	PBI SAF	PBI		1000	JE, GM, PIPER CARDUNUNGE		3	2
22	"	SIMULATOR	DFW	HOU			SIMUFLITE - STEEP TURNS, VSO, VS1, JET UPSET (WAKE TURBULENCE)		3	0
23	"	"	TEB	HPN			WINTER OPERATIONS ELECTRICAL, SINGLE ENGINE, RTO		3	6
24	"	"	DFW	COS			HIGH ALTITUDE, HYDRAULICS EMERGENCY DESCENT, WIND SHEAR		3	0
13	C-421B	N908GM	ZOR-SAF	ZOR		57	4 TAKE OFF + LANDING.	4/4		7
15	"	"	ZOR	SAF		58		1/1		2
AUG 1	"	"	SAF	ZOR		59	KRISTY RODGERS	1/1		4
9	G1159B	N908JE	PBI	TVC		1012	JE, GM	1/1	2	7
10	"	"	TVC	TEB		1013	JE, GM	1/1	1	5
13	"	"	TEB	PBI		1014	JE, GM		2	3
17	"	"	PBI	MVY		1015	JE, HEATHER MANN	1/1	2	5
17	"	"	MVY	TEB		1016	JE, HEATHER MANN	1/1		7
20	"	"	TEB	SAF		1017	JE, CELINA, GLEN, EVA, CELINA MIDELFART, DIDIER		3	9
23	"	"	SAF	TEB		1018	JE, CELINA MIDELFART, DIDIER, GLENN, EVA & CELINA DUBIN	1/	3	5
24	"	"	TEB	FOK		1019	REPOSITION	1/1		5
24	"	"	FOK	MVY		1020	JE, CELINA MIDELFART			4
25	"	"	MVY	PBI		1021	JE, CELINA MIDELFART	1/1	2	6
							Page Total	15/14	39	6
							Amount Forward	5931 / 5684	6964	3
							Total to Date	5946 / 5698	7003	9

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

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Date 1997 SEP	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		...and Class SEL
1	G1159B	N908JE	PBI	TEB		1022	JE, HEATHER MANN	1/1	2	6	
2	"	"	TEB	CMH		1023	REPOSITION	1/1	1	2	
3	"	"	CMH	TEB		1024	STEVE & JUDY TUCKERMAN	1/1	1	2	
3	"	"	TEB	LFPB		1025	JE, JACK ROBERTSON, STEVE & JUDY TUCKERMAN, YEHUDA & ZIPORA KOPPEL	[illegible]/1	6	6	
6	"	"	LFPB	LFMN		1026	JE, GM, JOAN & ANNIE GLENN, MARTY TRUST, FLIGHT ATTENDANT JERRY BECK, [illegible]	1/1	1	3	
7	"	"	LFMN	EGGW		1027	JE, GM	1/	1	6	
12	"	"	EGGW	CYJT		1028	JE, GM		5	5	
13	"	"	CYJT	PBI		1029	JE, GM		4	3	
15	"	"	PBI	TEB		1030	JE, GM	1/	2	3	
19	"	"	TEB	CMH		1031	JE, HEATHER MANN, DIDIER	1/1	1	2	
20	"	"	CMH	PBI		1032	JE, HEATHER MANN, DIDIER				
22	"	"	PBI	SAF		1033	JE, GM, DIDIER, CLAIRE HAZEL	1/1	3	6	
26	"	"	SAF	TEB		1034	JE, GM, DIDIER, DOUG SHULTE, ALBERTO PINTO, JACK ROBERTSON, PASCAL	1/	3	5	
28	"	"	TEB	PBI		1035	JE, GABRIELLE		2	4	
18	GIII	N883A	SAV	SAV			TEST FLIGHTS FOR NATHAN MYHRVOLD, STALLS, ALL SYSTEMS CHECKED	/1	2	0	
26	CESSNA 421	N908GM	ZQR-SAF-ABQ-ABQ-ZQR				CFI REVALIDATION RIDE, ILS APPROACH, ADF APPROACH	4/4	1	9	
OCT 4	G1159B	N908JE	PBI	STL		1036	REPOSITION	1/1	2	2	
4	"	"	STL	PBI		1037	JE, GM		2	2	
12	"	"	PBI	TEB		1038	JE, HEATHER MANN	1/	2	9	
							Page Total	16/13	50	4	
							Amount Forward	5946 / 5698	7003	9	2116
							Total to Date	5962 / 5711	7054	3	2116

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE
OCT 17	G1159B	N908JE	TEB	PBI		1039	JE, GM, CLAIRE, EMMY, DIDIER, 1 FEMALE		2 5
21	"	"	PBI	TEB		1040	JE, GM, MANDY EMMY, DIDIER	1/	2 2
~~JUL 13~~	~~CESSNA421~~	~~N908GM~~	~~ZORRO~~	~~SAF~~		~~57~~	~~CURRENCY REQUIREMENT~~	~~4/4~~	
24	"	"	TEB	BED		1041	JE, EMMY	1/1	7
24	"	"	BED	PBI		1042	JE, EMMY	1/1	2 6
27	"	"	PBI	TEB		1043	JE, GM, EMMY TAYLER	1/1	2 1
31	"	"	TEB	PBI		1044	JE, GM, ET, (GLEN, EVA, CELINA, JORDAN DUBIN) & NANNY	1/1	2 4
NOV 2	"	"	PBI	SAF		1045	JE, GM, ET, 1 FEMALE		3 8
4	"	"	SAF	TEB		1046	JE, GM, ET, GARY & MARY KERNEY	1/	3 4
7	"	"	TEB	JAX		1047	JE, LYNN FORESTER	1/1	1 9
7	"	"	JAX	PBI		1048	JE	1/1	7
8	C-421	N908GM	PBI	MIA		70	LARRY VISOSKI	1/	
24	G1159B	N908JE	PBI	TEB		1049	REPOSITION TO TEB	1/1	2 3
24	"	"	TEB	SAF		1050	JE, ET	1/1	3 9
25	"	"	SAF	PBI		1051	JE, ET	1/	3 0
29	"	"	PBI	TEB		1052	JE, DIDIER, CELINA MIDELFART, JOE PAGANO, GENE		2 2
DEC 6	"	"	TEB	PBI		1053	JE, GM, ET		2 2
9	"	"	PBI	TEB		1054	JE, GM, ET	1/1	2 2
11	"	"	TEB	PBI		1055	JE, EVA, CELINA, JORDAN DUBIN + NANNY		2 5
							Page Total	13 / 10	41 0
							Amount Forward	5962 / 5711	7054 3
							Total to Date	5975 / 5721	7095 3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1997 DEC	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
14	G1159B	N908JE	PBI	TEB		1056	JE, GLEN, EVA, CELINA, JORDAN DUBIN, MANNY, 2 FEMALES	1/1	2	1
17	"	"	TEB	BCT		1057	JE, MANDY ELLISON, GWENDOLYN BECK, WARREN SPECTOR, JIMMY + MRS CAYNE, ET		2	5
17	"	"	BCT	PBI		1058	JE, MANDY ELLISON, GWENDOLYN BECK, EMMY TAYLER			1
1998 JAN 3	"	"	PBI	TEB		1059	JE, GM, ET, GLEN DUBIN, JIMMY + MRS CAYNE, WARREN WHEETET, MARGARET WHEETET		2	3
8	"	"	TEB	SAF		1060	JE, GM, ET, DOUG SCHOETTLE	1/	3	8
10	"	"	SAF	PBI		1061	JE, GM, ET, DOUG SCHOETTLE	1/	2	7
13	"	"	PBI	TEB		1062	JE, GM, ET	1/1	2	3
18	"	"	TEB	PBI		1063	JE, ET, 1 FEMALE		2	4
20	"	"	PBI	TIST		1064	JE, GM, ET, GWENDOLYN BECK, SHERRI	1/	2	0
25	"	"	TIST	TNCM		1065	JE, GM, ET, MELINDA LUNTZ, SHERRI CRAPE	1/1		4
25	"	"	TNCM	TEB		1066	JE, GM, ET, ML, SC	1/	4	2
30	"	"	TEB	PBI		1067	JE	1/1	2	3
31	"	"	PBI	JAX		1068	JE	1/1		8
31	"	"	JAX	APF		1069	JE, ELLEN SPENCER	1/1		8
31	"	"	APF	PBI		1070	JE, ELLEN SPENCER	1/1		4
FEB 2	"	"	PBI	TEB		1071	JE, SOPHIE BIDDLE		2	2
6	"	"	TEB	PBI		1072	JE, GM, ET, SOPHIE BIDDLE, EVA, GLEN, JORDAN, CELINA DUBIN	1/1	2	6
9	"	"	PBI	TEB		1073	JE, GM, ET, CLAIRE HAZEL, JOEL PASHCOW, 1 FEMALE, ALAN DERSHOWITZ, MANDY, 3 DUBINS	1/	2	4
12	"	"	TEB	PBI		1074	JE, GM, JOEL PASHCOW, LAUREN PASHCOW, ET, JIM + MRS CAYNE, WARREN SPECTOR	1/	2	6
							Page Total	14 / 8	38	9
							Amount Forward	5975 / 5721 / 5489	7095	3
							Total to Date	5729	7134	2

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000014

Date 1997	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
DEC										
14	G1159B	N908JE	PBI	TEB		1056	JE, GLEN, EVA, CELINA, JORDAN DUBIN, NANNY, 2 FEMALES	1/1	2	1
17	"	"	TEB	BCT		1057	JE, MANDY ELLISON, GWENDOLYN BECK, WARREN SPECTOR, JIMMY + MRS COYNE, ET		2	5
17	"	"	BCT	PBI		1058	JE, MANDY ELLISON, GWENDOLYN BECK, EMMY TAYLOR			1
1998 JAN 3	"	"	PBI	TEB		1059	JE, GM, ET, GLEN DUBIN, JIMMY + MRS COYNE, WARREN WEXLER, MARGARET WEXLER		2	3
8	"	"	TEB	SAF		1060	JE, GM, ET, DOUG SCHOETTLE	1/	3	8
10	"	"	SAF	PBI		1061	JE, GM, ET, DOUG SCHOETTLE	1/	2	7
13	"	"	PBI	TEB		1062	JE, GM, ET	1/1	2	3
18	"	"	TEB	PBI		1063	JE, ET, 1 FEMALE		2	4
20	"	"	PBI	TIST		1064	JE, GM, ET, GWENDOLYN BECK, SHERRI	1/	2	0
25	"	"	TIST	TNCM		1065	JE, GM, ET, MELINDA LUNTZ, SHERRI CLAPP	1/1		4
25	"	"	TNCM	TEB		1066	JE, GM, ET, ML, SC	1/	4	2
30	"	"	TEB	PBI		1067	JE	1/1	2	3
31	"	"	PBI	JAX		1068	JE	1/1		8
31	"	"	JAX	APF		1069	JE, ELLEN SPENCER	1/1		8
31	"	"	APF	PBI		1070	JE, ELLEN SPENCER	1/1		4
FEB 2	"	"	PBI	TEB		1071	JE, SOPHIE BIDDLE		2	2
6	"	"	TEB	PBI		1072	JE, GM, ET, SOPHIE BIDDLE, EVA, GLEN, JORDAN, CELINA DUBIN	1/1	2	6
9	"	"	PBI	TEB		1073	JE, GM, ET, CLAIRE HAZEL, JOEL PASHCOW, 1 FEMALE, ALAN DERSHOWITZ, MANDY, 3 DUDES + 1	1/	2	4
12	"	"	TEB	PBI		1074	JE, GM, JOEL PASHCOW, LAUREN PASHCOW, ET, JIM + MRS COYNE, WARREN SPECTOR	1/	2	6
							Page Total	14 / 8	38	9
							Amount Forward	5975 / 5721	7095	3
							Total to Date	5989 / 5729	7134	2

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000015

Date 1998 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
1	C172	N75RR	LNA-F45	LNA			SHECKLOUT IN CESSNA 172	5/5		8
7	C172	N75RR	LNA-X10	PBI-LNA			CHRIS WAGNER, HOOD SOL, CONSTANT AIRSPEED CLIMBS, TURNS TO A HEADING, UNUSUAL ATTITUDES	3/3	2	0
14	G1159B	N908JE	PBI	SAF		1075	JE, GM, ET	1/1	3	9
15	"	"	SAF	LAS		1076	JE	1/1	1	3
15	"	"	LAS	VNY		1077	JE	1/1		7
18	"	"	VNY	MRY		1078	JE, BOB, KET, 3 FEMALES, 1 MALE			8
21	"	"	MRY	SAF		1079	JE		1	5
22	"	"	SAF	TEB		1080	JE, GM, ET	1/	3	3
27	"	"	TEB	DCA		1081	JE, ET, GWENDOLYN BECK	1/1		6
27	"	"	DCA	TIST		1082	JE, GWENDOLYN BECK		3	2
28	"	"	TIST	PBI		1083	JE, GM, ET, GB, GARY KERNEY	1/1	2	7
MAR 4	C421	N70BGM	PBI	AVO	CHRIS WAGNER		RADIO COMMUNICATIONS, FSS, PILOTAGE FLIGHT PLANS, VOR NAVIGATION RADAR	1/1		7
4	C421	"	AVO	LEE			CHRIS WAGNER, CLASS B CORRIDOR, VOR RADIALS, ADF BEARING	1/1		7
4	"	"	LEE	PBI			RADAR SERVICES, ARTCC, CLASS B CLEARANCE		1	0
"	"	"	PBI	AVO			CHRIS WAGNER - XC OVER 100NM / CHRIS WAGNER - HOOD TIME, PILOTAGE, RADIO	1/1		8
"	"	"	AVO	PBI			CHRIS WAGNER - VOR NAVIGATION, CONTROLLED AIRPORT OPERATIONS	1/1		8
12	"	"	PBI	EYW			CHRIS WAGNER - RADIO PROCEDURES, PILOTAGE, TODD LUCKEY +1	1/1	1	1
12	"	"	EYW	PBI			CHRIS WAGNER - VOR, NIGHT OPS .5 ACTUAL		1	0
20	G1159B	N908JE	PBI	PBI		1084	TEST FLIGHT AFTER OPS1	1/1		4
							Page Total	20 / 19	27	3
							Amount Forward	5989 / 5729	7134	2
							Total to Date	6009 / 5748	7161	5

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL

Date 19 98	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAR 23	G1159B	N908JE	PBI	TEB		1085	JE, GM, EVA ANDERSSON, CELINA JORDAN DUBIN, NANNY, 1 MALE	1/1	2	2
25	"	"	TEB	SAF		1086	JE, GM, ET		4	4
27	"	"	SAF	PBI		1087	JE, GM, DOUG SHOETTLE, ET	1/0	2	9
31	C172	N51898	LNA	LNA			CHECK OUT IN CESSNA 172	3/3		8
31	"	"	LNA-PBI-LNA				CHRIS WAGNER - 3 EMERGENCY LANDINGS, NIGHT REQUIREMENTS		1	3
16	C421	SIMULATOR					RECURRENT TRAINING AT SIMCOM			
17	"	"					EMERGENCY PROCEDURES			
18	"	"					INSTRUMENT COMPETANCY CHECK			
APR 5	G1159B	N908JE	PBI	TEB		1088	JE, HEATHER MITCHELL, BARRY MITCHELL, 1 FEMALE, MELINDO LUNTZ	1/1	2	5
6	"	"	TEB	W47		1089	JE, 2 FEMALES (REREBY FARMS)	1/1		7
6	"	"	W47	RIC		1090	JE, PAUL MELLON, 2 FEMALES CAROLYN	1/1		5
6	"	"	RIC	W47		1091	JE, PAUL MELLON, 2 FEMALES	1/1		4
6	"	"	W47	TEB		1092	JE, 2 FEMALES	1/1		7
9	"	"	TEB	BED		1093	JE, OLIVER SACHS	1/1		6
9	"	"	BED	TEB		1094	JE, OLIVER SACHS, ROBIN			9
9	"	"	TEB	PBI		1095	JE, GM, GLEN, EVA, CELINA, JORDAN, DUBIN, JEFF SCHANTZ, WIFE, 2 KIDS		2	3
11	C172	N75RR	LNA-FXE-LNA			1096	CHRIS WAGNER - MARIO, VOR CONTROLLED AIRPORT, EMERGENCY PROCEDURES	2/2	1	2
16	G1159B	N908JE	MBWN	MYNN		1096	JE (MET PRINCESS SARAH FERGUSON & KIDS ON THE GROUND)	1/1		6
16	"	"	MYNN	PBI		1097	JE	1/1		6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	Airplane	
Page Total	15 / 14	22	6
Amount Forward	6009 / 5748	7161	5
Total to Date	6024 / 5762	7184	1

CONFIDENTIAL DR_000017

Date 1998	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE
APR									
17	G1159B	N908JE	PBI	PBI		1098	CERTIFICATION FOR GPS APPROACHES	1/1	1 0
17	C421	N908GM	PBI	X21			CHRIS WAGNER - PATSY, KRISTY, LAURIE CONTROLLED AIRPORT OPERATIONS	1/1	9
17	C421	"	X21	TIX			SAME AS ABOVE	1/1	1
17	"	"	TIX	CRG			KRISTY RODGERS, PATSY S+L, CLIMBS, DESCENTS, TURNS	1/1	6
18	"	"	CRG	LAL			PATSY RODGERS, KRISTY S+L, CLIMBS, DESCENTS, TURNS	1/1	8
18	"	"	LAL	PBI			CHRIS WAGNER, LAURIE, KRISTY, PATSY VOR, PELAGE, RADIALS, RADIO COMM.	1/1	1 1
19	G1159B	N908JE	PBI	CMH		1099	JE, CLAIR HAZEL, 1 FEMALE	1/1	2 0
20	"	"	CMH	LUK		1100	JE, GINGER, MANDY LANE	1/1	3
20	"	"	LUK	TEB		1101	JE, GINGER, MANDY LANE	1/1	1 2
~~24~~	~~"~~	~~"~~	~~TEB~~	~~PBI~~		1102	~~JE, GM, COCO BROWN, ET, LINDA~~	1/1	2 2
25	C172	N75RR	LNA-PBI-LNA				CHRIS WAGNER - NO FLAP APPROACHES EMERGENCY PROCEDURES - CLASS C	4/4	1 0
25	"	"	LNA	LNA			SHORT, SOFT, REJECTED TAKEOFF, EMERGENCY LANDINGS - CHRIS WAGNER	6/6	8
26	"	"	LNA-PBI-LNA				TRAFFIC PATTERN, EMERGENCY LANDINGS, CLASS C OPERATIONS	5/5	9
26	G1159B	N908JE	PBI	TEB		1103	JE, GM, ET	1/	2 3
MAY	"	"	TEB	PBI		1104	JE, GM, ET, GLEN DUBIN, JORDAN, CELINA, & NANNY	1/1	2 5
1	C172	N75RR	LNA-PBI-LNA CHRIS WAGNER				SHORT & SOFT FIELD T.O. + L, EMERGENCY LANDINGS, TAS, CLASS C OPERATION	11/11	1 5
3	G1159B	N908JE	PBI	TEB		1105	JE, GM, ET, NADIA, GLENN, EVA, CELINA, JORDAN, NANNY, & WENDELIN BECK	1/	2 3
5	"	"	TEB	BED		1106	JE, ROBIN	1/1	6
5	"	"	BED	TEB		1107	JE, ROBIN, STEVEN		7

I certify that the statements made by me on this form are true.

	Number of Landings	Aircraft Category... AIRPLANE
Page Total	40 / 38	22 9
Amount Forward	6024 / 5762	7184 1
Total to Date	6064	72[illegible] 9

Pilot's Signature David Rodgers

Date 19 96	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
MAY 7	G1159B	N908JE	TEB	PBI		1108	JE, ET		2	3
9	"	"	PBI	TIST		1109	JE, GT, SHERRCE, CLAIR HAZEL	1	2	0
11	"	"	TIST	TEB		1110	JE, GM, GT, CLAIRE HAZEL, CHRIS KANE	1	3	7
15	"	"	TEB	PBI		1111	JE, MANDY ELLISON	1	2	0
17	"	"	PBI	TEB		1112	JE	1	2	4
18	"	"	TEB	MOW		1113	GM, ET, SHANNON HEALY, ALBERTO PINTO, 1 MALE	1	1	6
18	"	"	MOW	SAF		1114	GM, ET, JE, SHANNON, ALBERTO, 1 MALE		2	5
20	"	"	SAF	LAX		1115	JE, GM, ET, ALBERTO, PASCAL, 1 MALE	1	1	7
20	"	"	LAX	TEB		1116	GM, ET, ALBERTO, 1 MALE	1	4	5
JUN 4	"	"	TEB	PBI		1117	JE, MANDY ELLISON, 1 FEMALE	1	2	2
8	"	"	PBI	TEB		1118	JE, GWENDOLYN BECK, 1 FEMALE	1	2	5
12	"	"	TEB	TIST		1119	JE, GM, ET, CLAIRE HAZEL, MELANIE STARNES	1	3	0
15	"	"	TIST	JFK		1120	JE, GM, ET, CLAIRE HAZEL, MELANIE STARNES	1	4	3
18	"	"	JFK	PBI		1121	JE, GM, LYNN FONTANILLA, CRAIG ADAMS		2	0
21	"	"	PBI	TEB		1122	JE, RALPH ELLISON, LYNN FONTANILLA, GARY ROXBURGH	1	2	5
23	"	"	TEB	BED		1123	JE, GARY ROXBURGH	1		7
23	"	"	BED	TEB		1124	JE, HENRY ROSOVSKY, GARY ROXBURGH	1	1	2
26	"	"	TEB	PBI		1125	JE, GM, MELINDA LUNTZ, GARY ROXBURGH	1	2	6
TOTAL AT BOTTOM OF PAGE REPORTED TO INSURANCE COMPANY										

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Aircraft Category	
Page Total	15	43	7
Amount Forward	6066 / 5900	7206	9
Total to Date	6079	725[illegible]	6

Date 1918 JUL	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	
5	G1159B	N908JE	PBI	OXC		1126	JE	1/1	2	5
5	"	"	OXC	TEB		1127	JE	1/1		4
10	"	"	TEB	PBI		1128	JE, SOPHIE BIDDLE, 2 FEMALES	1/1	2	3
12	C150	49563	JVY	JVY		*	C150 CHECK OUT DAN-CFI JOHNSON	2/2		6
12	"	N778ME	JVY	JVY		1	JONATHAN MAND - PREFLIGHT, CHECKLIST, ENGINE START, MIXTURE CONTROL, S&L, TURNS (1)	2/2	1	4
13	"	"	"	"		2	ARROW, TRAFFIC PATTERNS, CLIMBS, TURNS, MCA, FORWARD + SIDE SLIP, DESCENTS (2)	3/3	1	1
13	"	"	"	"			EMERGENCY LANDINGS, NORMAL TAKEOFFS	2/2		5
16	"	"	"	"		3, 4	JONATHAN MAND, Vy, Vx, STEEP TURNS, MCA [illegible] FORWARD SLIP, T&L, BASIC RADAR PROCEDURES	4/4	1	0
16	"	"	"	"		5	JONATHAN MAND, CLIMBING TURNS, DEPARTURE AND ENTRY OF TRAFFIC PATTERN, ALL STALLS, [illegible], ATS,	3/3		9
17	"	"	"	"		6	GO AROUND, TRIM, BASIC RADAR PROCEDURES, TRIM, S-TURNS, TBP, MCA, ENGINE FAILURE	2/2	1	1
17	"	N45563	JVY	BQM		7	VOR TRACKING, STALLS-POWER ON, OFF, BANK, MCA, CONTROL TOWER OPERATIONS	2/2		8
17	"	"	BQM	JVY			ATIS, GROUND CONTROL, NORMAL TAKEOFF + LANDINGS, RADAR PROCEDURES	4/4		8
17	"	N778ME	JVY	JVY		8	FLIGHT AT VARIOUS AIRSPEEDS FROM CRUISE TO SLOW FLIGHT, FULL STALLS, STALLS FROM VARIOUS ATTITUDE AND DEVICE CONFIGURATION	5/5	1	2
19	"	"	"	"			CROSSWIND TAKE-OFF + LANDINGS, DESCENTS USING HIGH & LOW DRAG CONFIGURATION, RTO	9/9		8
18	"	"	JVY (LOT)	IMS		19	CHECKPOINTS, FAA FLIGHT PLAN ACTIVATION, PILOTAGE, DEAD RECKONING, ALTERNATE AIRPORT	1/1	1	4
18	"	"	IMS	JVY		19	Vx, VOR TRACKING, VOR PASSAGE, VOR RADIALS, LEVEL OFF IN DESCENTS, CROSSWIND LANDING	1/1		4
28	G1159B	SIMULATOR	IRW	IRW			RTO, STEEP TURNS, ALL STALLS, RECOVERY [illegible], NO ENGINES LANDING, ILS, SINGLE ENGINE ILS, NDB		2	1
29	"	"	HUB	HOU		--	JET UPSET (WAKE TURBULENCE) DOUBLE [illegible] FAILURE, SINGLE ENGINE GO AROUND, HOLDING		1	8
30	"	"	CYS	COS			WINDSHEAR, HOT-HIGH ALTITUDE OPERATIONS, CIRCLING APPROACH, VOR, EMERGENCY DESCENT, HYDRAULIC PROBLEMS, NO FLAP APPROACH, DME ARC,		2	1
							Page Total	43/43	23	2
							Amount Forward	6079 / 5809	7250	6
							Total to Date	6122	7273	8

I certify that the statements made by me on this form are true.

Daniel Dorlan

Date 19 98 AUG	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER	
3	G1159B	N908JE	PBI	TEB		1136	JE, GM, ADAM, EMMY, RON	1/1	2	5		
4	"	"	TEB	HTO		1137	JE, MELANIE SITONUCS	1/1		7		
4	"	"	HTO	OQU		1138	NO PASSENGERS	1/1		5		
4	"	"	OQU	TEB		1139	JE	1/1	1	1		
5	"	"	TEB	BED		1140	JE	1/1		8		
5	"	"	BED	MVY		1141	JE	1/1		5		
5	"	"	MVY	TEB		1142	JE	1/1	1	0		
6	"	"	TEB	CMH		1143	JE	1/1	1	3		
6	"	"	CMH	TEB		1144	JE	1/1	1	3		
7	"	"	TEB	TVC		1145	JE, GM, ET, MCLIDDA LUNSZ		1	8		
11	"	"	TVC	TEB		1146	JE, GM, ET	1/1	1	5		
13	"	"	TEB	PBI		1147	JE, GM, ET, PAULA EPSTEIN		2	4		
17	"	"	PBI	TEB		1148	JE, GM, ET	1/	2	5		
21	"	"	TEB	SAF		1149	JE, GM, ET, ADAM PERRY LANG	1/1	3	6		
24	"	"	SAF	ASE		1150	JE	1/1		8		
22	SCHIDE SP34	N44246	OEO	OEO			T.O. + TOW ASSISTED, STRAIGHTS, GLIDES, TURNS, THERMALS, X COUNTRY SAILPLANE				9	
25	G1159B	N908JE	ASE	VNY		1151	JE, JOE PAGANO, GWENDOLYN BECK	1/	1	9		
29	"	"	VNY	PBI		1152	JE	1/1	4	9		
9-1	"	"	PBI	TEB		1153	JE, GM	1/1	2	4		
							Page Total	16/14	31	7	9	
							Amount Forward	6122 / 5852	7273	8		
							Total to Date	6138	7305	5	9	

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 1998	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider
9-4	G1159B	N908JE	TEB	TIST		1154	JE, GM, ET	1		
4	"	"	TIST	PBI		1155	JE, GM, ET	1	3 7	
8	"	"	PBI	TEB		1156	JE, GM, ET, MANDY ELLISON	1	2 5	
13	"	"	TEB	SAF		1157	JE, GM, ET, ALBERTO + LENNA PINTO	1	2 7	
9/15	GROB 103 IIA	N3078G	OEB	CCL			TOW ALONE THERMALING		4 0	
9/15	G103 IIA	N3078G	OEB	CCL			UNASSISTED T.O.L. Thermaling 3 STALL			3
9/15	G103 IIA	N3078G	OEB	CCL			UNASSISTED T.O.L. THERMALING			4
9/15	G103 IIA	"	"	CCL			UNASSISTED TOW # LANDING IN LIGHT X wind			5
9/15	"	"	"	CCL			UNASSISTED TO WE LANDING THERMALING STALLS, UNCERTAIN SPALS			3
9/15	"	N3078G	"	CCL			PATTERN TOW			4
9/15	"	~~N3078G~~	"	CCL			~~PATTERN TOW~~			3
9/17	G1159B	N908JE	SAF	ASE		1158	JE, ET		6	
19	"	"	ASE	IAD		1159	JE, ET, LARRY SUMMERS, GWENDOLYN [illegible]	1		
19	"	"	IAD	TEB		1160	JE, ET, GWENDOLYN BECK	1	3 0	~~3~~
25	"	"	TEB	DCA		1161	JE, LYNN FORESTER		6	6
25	"	"	DCA	IAD		1162	REPOSITION FOR CURFEW	1	7	7
25	"	"	IAD	TEB		1163	JE, LYNN FORESTER		1	1
26	"	"	TEB	PBI		1164	JE, GM		7	7
Oct 4	"	"	PBI	TEB		1165	JE, ET, LUBA, DARA	1	2 1	
									2 2	
							Page Total	5/6	22 9	2 4
							Amount Forward	6138 / 5866	7305 5	9
							Total to Date	6146 / 5872	7328 4	3 3

Signature/endorsement written across the remarks: [illegible signature] LFFG1616055 9/20/00

I certify that the statements made by me on this form are true.

Pilot's Signature: [signature]

CONFIDENTIAL DR_000022

Date 1998 OCT	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER	
6	G-1159B	N908JE	TEB	BED		1166	JE, RHONDA SHEARER	1/1		6		
6	"	"	BED	TEB		1167	JE, RHONDA SHEARER + HUSBAND			7		
9	"	"	TEB	OCA		1168	JE, GT, ADAM PERRY LANG	1/1		7		
9	"	"	OCA	PBI		1169	JE, GM, GT, AP		2	6		
12	"	"	PBI	TEB		1170	JE, GM, GT, AP	1/	2	3		
15	"	"	TEB	PBI		1171	JE, SOPHIE BIDDLE		2	1		
19	"	"	PBI	TEB		1172	JE, SOPHIE BIDDLE	1/	2	2		
21	"	"	TEB	BED		1173	JE	1/1		6		
21	"	"	BED	TEB		1174	JE, ALAN DERSHOWITZ	1/1		8		
23	"	"	TEB	PBI		1175	JE, GM, GT, GWENDOLYN BECK	/	2	3		
NOV 7	"	"	PBI	TEB		1176	NO PASSENGERS	1/1	2	3		
7	"	"	TEB	PBI		1177	JE		2	3		
10	"	"	PBI	TEB		1178	JE	1/	2	5		
14	"	"	TEB	TIST		1179	JE, GT, CLAIRE HAZEL, FRANCOIS	1/1	3	2		
15	"	"	TIST	PBI		1180	JE, GM, CLAIRE HAZEL, GT, FRANCOIS	1/1	2	4		
16	"	"	PBI	CMH		1181	JE, GM, GT, CLAIRE HAZEL, FRANCOIS	1/1	2	0		
16	"	"	CMH	TEB		1182	JE, GM, GT, FRANCOIS	1/	1	1		
20	"	"	TEB	TIST		1183	JE, GM, GT, AP	1/1	3	3		
1	C421B	N908GM	PBI - NORTH... - PBI					3/3	1	0		
							Page Total	16/12	34	4		
							Amount Forward	6146/[illegible]	7328	4	3	3
							Total to Date	6162/[illegible]	7362	8	3	3

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000023

Date 1998 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
26	G-1159B	N908JE	TIST	PBI		1184	JE, GM	✓	2 5		
29	"	"	PBI	TEB		1185	JE, GM, MARK EPSTEIN, LYNN FORESTER + 2, BOB, EVA ANDERSON, GLENN DUBIN, CELINA, JORDAN		2 5		
DEC 4	"	"	TEB	PBI		1186	JE, ALEXIA	✓	2 2		
8	"	"	PBI	TIST		1187	JE, SOPHIE BIDDLE	✓	2 3		
8	"	"	TIST	SAV		1188	OPS 2 INSPECTION	✓	3 0		
31	"	"	SAV	PBI		1189	OPS 2 COMPLETED		9		
1999 JAN 1	"	"	PBI	TIST		1190	REPOSITION	✓	2 1		
1	"	"	TIST	PBI		1191	JE, GM	✓	2 5		
4	"	"	PBI	TEB		1192	JE, GM, MARK EPSTEIN, MANDY & RALPH [illegible], MERCEDES	✓	2 2		
9	"	"	TEB	ABY		1193	JE, ALEXIS	✓	2 5		
10	"	"	ABY	SAF		1194	JE, ALEXIS	✓	3 0		
12	"	"	SAF	VNY		1195	JE, ALEXIA	✓	1 6		
15	"	"	VNY	PBI		1196	JE, JEAN LUKE		4 2		
19	"	"	PBI	TIST		1197	JE, GM, ET	✓	2 1		
24	"	"	TIST	TEB		1198	JE, GM, ET, [illegible]	✓	3 6		
29	"	"	TEB	PBI		1199	JE, GM, ET, AP, [illegible], GLEN, CELINA, JOHANN RUPERT	✓	2 3		
[illegible]	[illegible]	[illegible]	PMP - PB	- PMP		1	SEE MANEUVERS INDEX: A, B				1 2
FEB 1	G1159B	N908JE	PBI	TEB		1200	JE, GM, ET, AP, EVA, CELENA, JORDAN, NANNY	✓	2 5		
2	206B3	[illegible]	PMP	PMP		2	A, E				8
							Page Total	14/8	42 0		2 0
							Amount Forward	6162/5884	7362 8	3 3	
							Total to Date	6176/5892	7404 8	3 3	2 0

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000024

GIUFFRE007078
CONFIDENTIAL

Date 1999 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
3	206B3	59PH	PMP	PMP		3	A, E, F				
4	"	"	"	"		4	A, G - Full controls				
5	G-1159B	N908JE	TEB	PBI		1201	JE, GM, ET, MELANIE STAFFORD(?), MELINDA LUNTZ, CLAIRE HAZEL	1/1	2 1		
02/05	206B3	59PH	PMP	PMP		5	A, E - Advanced maneuvers				
02/06	206B	59PH	PMP-PBI	PMP		6	A-E / started C + D				
2/7	"	"	"	"		7	A - 1K				
7	G-1159B	N908JE	PBI	TEB		1202	JE, GM, ES, MELINDA LUNTZ, MELANIE WALKER, 1 FEMALE				1 1
9	"	"	TEB	TIST		1203	JE, GM, ES, AP, PRINCE ANDREW STEVE BURGESS		2 1		
12	"	"	TIST	PBI		1204	JE, GM, ES, AP, PRINCE ANDREW, STEVE BURGESS, GWENDOLYN BECK, CLAIRE HAZEL, ANNA MALIA(?)	1/	3 3		~~3~~ 2
13	206B3	59PH	PMP - LCL - PBI - PMP				A - F / Started G		2 6		
02.15	BH 206B2	N7010H	VNY	PIRU VNY			PATTERNS, N. APP. T/O, VERT T/O + LDG, X-WIND + DWN WIND HOVER, QUICK STOPS, 3/1 AUTOS, CLR AVOID	5			2
14	G-1159B	N908JE	PBI	SAF		1205	JE, GM, LADNE KELSON(?)	1/1	3 6		1
15	"	"	SAF	VNY		1206	JE	1/1	1 6		
16	B206B3	N7010H	VNY -	PIRU - VNY			TRAFFIC PATTERNS, APPROACHES, OGE HOVER, HOVER, PEDAL TURNS, A/SPEED CHANGES				1 0
17	G-1159B	N908JE	VNY	MRY		1207	JE + 3	1/1	7		
20	"	"	MRY	SAF		1208	JE	1/1	1 9		
21	"	"	SAF	TEB		1209	JE, GM, JENNIFER, SHARON, CLEMENTINE	1/	3 5		
24	"	"	TEB	PBI		1210	JE, ET, EVA, GLENN(?), JORDON, NANNY, HEATHER, JO ANNE		2 4		
26	206L3	500JA	PMP	PMP			Reviewed A-F, Demo - H, J, + V				1 5
							Page Total	7/5	23 8		11 2
							Amount Forward	6176 / 5892	7464 8	3 3	2 0
							Total to Date	6183 / [illegible]	7428 6	3 3	13 2

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19 99	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
27	206L3	N500JA	PMP	PMP			A-F,I,J,M,+V /DEMO-N				1 3
03/01	206L3	500JA	PMP	PMP			C,D,M,+V				1 1
3/1	206B2	N70PH	PMP-LNA-PBI-PMP				ENG TRAINING, INCLUD. [illegible]				4 1
03/02	206L3	500JA	PMP	PMP			N,H,+J				1 8
03/03	206L3	500JA	PMP-PBI-PMP				A-F				1 0
03/04	206L3	500JA	PMP-PBI-BAT-PMP				A,H (Pre-solo prep)				1 5
03/05	206L3	500JA	PMP-PBI-LNA-PMP				A,H (Pre-solo prep)				1 6
03/06	206L3	500JA	PMP-PBI-LNA-PMP				Finished prep / 1st solo at PMP				1 1
3/7	G-1159B	N908JE	PBI	TEB		1211	JE, GM, ET, MELINDA LUNTZ, NIX 3 FEMALES	1/	2 5		
3/13	PA28-161	N510PU	IVY	GRD			JONATHAN MANO - ATC CLEARANCES AND PROCEDURES FLIGHTS BY REFERENCE TO INSTRUMENTS	1/1	4 2		
3/13	PA28-161	N510PU	GRD	ORL			NAVIGATION SYSTEMS, PARTIAL PANEL, ATC COMMUNICATION, ILS APPROACH, IFAL, ALTERNATE [illegible]	1/1	4 8		
3/16	206L3	500JA	PMP	PMP			TRAFFIC PATTERN,				1 9
3/17	C421B	N908GM	PBI	EYW			JONATHAN MANO, [illegible], NAVIGATION, MULTIENGINE OPERATIONS	1/1	1 5		
3/17	C421B	N908GM	EYW	PBI			JONATHAN MANO - [illegible] [illegible] SPIC S&L [illegible]		2 5		
3/16	PA28-161	N510PU	ORL	DBN			JONATHAN MANO - INSTRUMENT APPROACH PROCEDURES 250NM XC FAR 61.65 (i)(2)(iii)	1/0	4 0		
3/19	PA28-161	N510PU	DBN	IVY			JONATHAN MANO - EMERGENCY OPERATIONS, ETO PARTIAL PANEL, PREFLIGHT PREP + PROC., & POSTFLIGHT	1/1	4 5		
3/21	G1159B	N908JE	TIST	TEB		1214	JEFFREY, TIFFANY GRANGA, CLEMENTINE HAMBRO, ENLA DOERRIE	1/	4 2		
3/23	206L3	500JA	PMP-215-SUA-PMP				DUAL CROSS COUNTRY				2 3
3/23	206L3	500JA	PMP	PMP			BCD				1 4
							Page Total	7/4	28 2		19 1
							Amount Forward	6183 / 5897	7428 6	3 3	13 2
							Total to Date	6190 / [illegible]	7456 8	3 3	32 3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL

Date 19 94	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
MAR											
3/23	206L3	500JA	PMP-NORTHWEST-PMP				12 TAKEOFFS + LANDINGS / Q	(12)			.6
3/24	206L3	500JA	PMP-SUA-2IS-AMP				SOLO CROSS COUNTRY				2.[illegible]
3/24	206L3	500JA	PMP-X51-PMP				SOLO CROSS COUNTRY				1.[illegible]
3/25	G1159B	N908JE	TEB	PBI		1215	JE, ET, AP, EVA, WILDMA, JORDAN, NANNY 2 FEMALES		2.5		
3/26	206L3	500JA	PMP-LNA-PMP				SOLO LOCAL				2.[illegible]
3/26	206L3	500JA	PMP-PHK-PMP				P, Q	(2)			1.6
3/27	G1159B	N908JE	PBI	TIST		1216	JE, ET, AP, 2 FEMALES	1/1	2.8		
3/29	"	"	TIST	PBI		1217	SHELLEY AND LEWIS TIFFANY KATHRYN GRANZA	1/1	2.9		
3/30	"	"	PBI	TEB		1218	REPOSITION TO TEB	1/1	2.5		
3/31	"	"	TEB	TIST		1219	GM, ALBERTO + LENDA PINTO, PHILLIPE MUGNIER, GRANICOS VERONICA	1/1	3.5		
3/31	"	"	TIST	PBI		1220	JE, GM, ALBERTO, LENDA, ET, AP PHILLIPE MUGNIER, GRANICOS VERONICA	1/1	2.7		
4/2	"	"	PBI	ABQ		1221	JE, AP, ALBERTO, LENDA, PHILLIPE, GRANICOS, 1 MALE	1/1	4.0		
4/4	"	"	ABQ	TEB		1222	JE, GM, CLAIRE HAZEL	1/1	3.5		
4/5	206L3	500JA	PMP	PMP			SOLO LOCAL				.6
4/5	206L3	500JA	PMP-LAL-PMP				A-I PVT FOR PVT TEST				1.2
4/6	206L3	500JA	PMP-BCT-PMP				A-II, M, N PREP FOR PVT TEST				1.7
4/7	206L3	500JA	PMP	PMP			A-E, G, H, L, O, R, U, V PREPFOR PUTTEST				1.6
4/8	G1159B	N908JE	TEB	PBI		1223	JE, GM, AP, ERICA, KIRSTEN	1/1	2.3		
4/10	206L3	500JA	PMP-LNA-PBI-PMP				A-H, J, L, M, N, R, + V				1.[illegible]
							Page Total	8/7	26.2		15.8
							Amount Forward	6140 / 5901	7456.8	3.3	32.3
							Total to Date	6198 / 5908	7483.0	3.3	48.1

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000027

CONFIDENTIAL

Date 1999 APR	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPT
11	G1159B	N908JE	PBI	TEB		1224	JE, GM, ET, AP, CHARLES, MONICA, 2 FEMALES, INCA	1/1	3.2		
13	206L-3	5000JA	PMP	PMP			PPL [illegible] A-D, G, H, J, M, [illegible]				1.[illegible]
14	206L-3	5000JA	PMP	PMP			SOLO LOCAL				1.7
16	G1159B	N908JE	TEB	PBI MVY		1225	JE, GT, ALAN DERSHOWITZ, 1 MALE	1/1	.7		
16	G1159B	"	MVY	BOS		1226	JE, GT, 1 MALE	1/1	.5		
16	"	"	BOS	PBI		1227	JE, GT [illegible]	1/1	3.1		
20	"	"	PBI	TIST		1228	JE, GM, GT	1/1	2.4		
25	"	"	TIST	TEB		1229	JE, TIFFANY GRANZA, DANIEL HILLS, ALEXIA WALLACE	1/1	4.0		
27	"	"	TEB	TIST		1230	JE, SOPHIE BIDDLE, 1 FEMALE		3.4		
MAY 2	"	"	TIST	TEB		1231	JE, SOPHIE BIDDLE, TIFFANY GRANZA, SHELLEY LEWIS	1/D	3.7		
5	"	"	TEB	PBI		1232	JE, GM, CLAIRE HAZEL, TIFFANY GRANZA, [illegible] TERRY	1	2.3		
7	206L-3	500JA	PBI	PBI			Private Pilot Rotorcraft Helicopter Checkride "Passed" [illegible] 1750-[illegible] 10-31-98				.9
7	"	"	PMP-LNA-PBI				PPL PREP - A-J, M, N, R + V				1.7
7	"	"	PBI	PMP			Return/started CPL Training				.8
8	"	"	PMP-LNA-PBI				H, + 1 (Right), includ. 0-speed + S-Turns				1.6
8	"	"	PBI-LNA-PMP				H + 1 (Left)				1.4
10	G1159B	N908JE	PBI	BED		1233	JE, GM, CLAIRE HAZEL, TIFFANY GRANZA, INCA DOGRRIC	1/1	2.8		
10	"	"	BED	TEB		1234	GM, CLAIRE HAZEL, TIFFANY GRANZA, INCA DOGRRIC		.9		
16	206L-2	5000JA	PMP	PMP			H + 1 (Left + Right 500-700')				1.5

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

	Number of Landings	Airplane	Glider	Helicopter
Page Total	8/9	26.9		11.4
Amount Forward	6198 / 5408	7483.0	3.3	48.1
Total to Date	6207 / 5415	7509.9	3.3	59.5

CONFIDENTIAL DR_000028

GIUFFRE007082
CONFIDENTIAL

Date 1999 M/D	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
17	G1159B	N908JE	TEB	SAF		1235	GT, RDW	1/	3 6		
17	"	"	SAF	ABQ		1236	GS, RAH		2		
18	"	"	ABQ	DAL		1237	[illegible]	1/1	1 5		
18	"	"	DAL	PBI		1238	JE, GS, TIFFANY GRAMZA		2 3		
19	[illegible]	N500JA	PBI-LNA	PBI			STRAIGHT IN + 180 AUTOROTATIONS				1 [illegible]
20	"	"	PMP	PMP			M, V, & Approaches to the surface, and noise sensitive proc.				1 [illegible]
21	"	"	PMP	DAB			O- Via shoreline				2 [illegible]
21	"	"	DAB	PBI			O- Via I-95				1 7
21	"	"	PBI	PMP			Return				3
23	G1159B	N908JE	PBI	TEB		1239	JE, GM, GT, TIFFANY GRAMZA	1/1	2 7		
	FLIGHT TIMES REPORTED TO INSURANCE COMPANY								FOR		
27	G1159B	N908JE	TEB	PBI		1240	JE, GM, GT, [illegible] GVA, CELINA, JORDAN + NANNY [illegible]	1/1	2 3		
29	"	"	PBI	TIST		1241	JE, GM, GT		2 3		
30	"	"	TIST	PBI		1242	JE, GM, GT	1/1	2 8		
31	"	"	PBI	SAF		1243	JE, GM, GT	1/1	3 7		
JUN 4	"	"	SAF	PBI		1244	JE, GM, GT, TIFFANY GRAMZA	1/	3 2		
7	"	"	PBI	TEB		1245	JE, GM, GT, TIFFANY GRAMZA	1/1	2 5		
9	"	"	TEB	PBI		1246	JE, [illegible], MANDY GIBSON, TIFFANY GRAMZA		2 3		
15	"	"	PBI	TEB		1247	JE, GM, TIFFANY GRAMZA, GWYNDOLYN BECK	1/1	2 5		
							Page Total	9/7	32 1		6 1
							Amount Forward	6207 5915	7509 9	3 3	59 5
							Total to Date	6216	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1919	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
JUN 25	ZENITH	N2828	PBI-LNA	PBI			STALLS, EMERGENCY, CRITICAL ATTITUDE RECOVERY, EMERGENCY LANDING, SPECIFICAL...	6/6	1 3		
19	G1159B	N908JE	TEB	PBI		1248	JE, GM, ET	/	2 4		
27	"	"	PBI	TEB		1249	JE, ET, SHELLEY	1/1	2 5		
29	"	"	TEB	BED		1250	JE	1/1	0		
29	"	"	BED	TEB		1251	JE		1 0		
JUL 1	"	"	TEB	PBI		1252	JE, ET, TIFFANY GRANZA	1/	2 3		
2	KATANA	N6910A	FPR	FPR			CHECK OUT, STALLS, STEEP TURNS, EMERGENCY LANDING, PRECAUTIONS	5/5	0		
3	G1159B	N908JE	PBI	TIST		1253	JE, CLAIRE HAZEL, TIFFANY GRANZA	1/1	2 6		
4	"	"	TIST	TEB		1254	JE, CLAIRE HAZEL, TIFFANY GRANZA	1/1	3 7		
6	Bell 206 B-III	N16909	PMP-SUA	PMP			DUAL CROSS COUNTRY AT NIGHT MORE THAN 50 NM				2 2
7	"	"	PMP-X44-LNA-PMP				SOLO NIGHT				2 3
13	"	"	PMP-X44-PMP				SOLO NIGHT				2 8
16	DA20	N125MF	HWO	HWO			Pelican Katana Vout (Co-Brown) Buckle out	2/2	9		
16	DA20	"	HWO-PBI	HWO			JEFFREY EPSTEIN 1.0 TAKE-OFF, TAXING, SLOW FLIGHT, RECOVERING UNDER PATTERN, LANDING	3/3	3 4		
15	G1159B	N908JE	TEB	PBI		1255			2 5		
22	"	"	PBI	SAF		1256	JE, GM, ET	1/1	3 4		
25	"	"	SAF	VNY		1257	JE, GM, ET, LISA	1/1	1 7		
29	"	"	VNY	OAK		1258	JE, SHELLEY	1/1	9		
29	"	"	OAK	SAF		1259	JE, SHELLEY	1/1	2 2		
							Page Total	26/24	32 6		7 3
							Amount Forward	6216/5922	7542 0	3 3	65 6
							Total to Date	6242	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

[signature]

Date 19__ JUL	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOP.	
29	G-1159B	N908JE	SAF	PBI		12[illegible]	JE, SHELLEY			3	5				
AUG 4	"	SIMULATOR	JFK	JFK			STEEP TURNS, STALLS, WAKE TURBULENCE, ENGINE [illegible] REJECTED TAKE-OFF, HOLDING, V1 [illegible] TAKEOFF			3	8				
5	"	"	"	"			SINGLE ENG [illegible] APPROACHES & GO-AROUNDS, HYDRAULIC, DOUBLE ENGINE FAILURE, [illegible]			3	8				
6	"	"	" -SWF-	"			[illegible], EMERGENCY DESCENT, NON-PRECISION APPROACH, SINGLE ENGINE WORK			2	7				
7	"	N908JE	TEB	PBI		1262	JE, GM, ET, CLAIRE HAZEL, 1 FEMALE	DAVE KILLORY	✓ 1	2	3				
8	"	"	PBI	TEB		1263	JE, ET, 1 FEMALE	DAVE KILLORY	✓	2	4				
11	"	"	TEB	PBI		1264	JE, ET		✓ 1	2	7				
14	"	"	PBI	MTP		1265	JE, GM, ET, CLAIRE HAZEL		✓ 1	1	9				
14	"	"	MTP	TIST		1266	JE, GM, ET, CLAIRE HAZEL		✓	1	4				
18	"	"	TIST	TEB		1267	JE, GM, ET, CLAIRE HAZEL		[illegible]	2	[illegible]				
19	206L3	72PH	FLL	LNA			[illegible] AUTO, NORMAL & SHALLOW, STEEP, MAX PERF. TAKE OFF, HYDRAULICS, [illegible]			~~2~~	~~6~~			1	[illegible]
23	G-1159B	N908JE	PBI	TIST		1268	JE, ADAM, TIFFANY, PAULA		✓ 1	2	6				
26	"	"	TIST	PBI		1269	JE, ADAM, TIFFANY		✓	2	7				
28	"	"	PBI	TEB		1270	JE, GM, ET		✓ 1	2	5				
SEP 1	"	"	TEB	AGC		1271	JE, ET		✓ 1	1	0				
1	"	"	AGC	CMH		1272	JE, ET		✓ 1		7				
2	"	"	CMH	TEB		1273	JE, ET, CLAIRE, VICTORIA, MRS HAZEL, COUSIN		✓ 1	1	4				
2	"	"	TEB	SAF		1274	JE, ADAM, SHELLEY, TIFFANY, ALBERTO, ELENA PINTO			3	7				
5	"	"	SAF	SAN		1275	JE, SHANNON HEALY, TIFFANY, SHELLEY		✓ 1	1	7				
							Page Total		12/[illegible]	43	4			1	4
							Amount Forward		6242 / 5146	7574	6	3	3	72	9
							Total to Date		6254	7618	0	3	3	74	3

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
5	G-1159B	N908JE	SAN	SAF	RE	1276	JE, SHANNON HEALY	1/1	1 6		
7	G1	"	SAF	TEB		1277	JE, CLAIRE, VICTORIA HAZEL, ADAM	1/1	3 5		
8	"	"	TEB	CMH		1278	JE, CLAIRE HAZEL	1/1	1 4		
8	"	"	CMH	TEB		1279	JE, CLAIRE, MARSHALL, MALE		1 3		
9	"	"	TEB	PBI		1280	JE, ELIZABETH		2 5		
13	"	"	PBI	TEB		1281	JE, GM, PAULA EPSTEIN, MANDY, RALPH ELLISON, CLAIRE HAZEL	1/1	2 4		
17	"	"	TEB	PBI		1282	JE, GM, PAULA EPSTEIN, ET, CLAIRE HAZEL		2 4		
19	C-172	N2388L	LNA	LNA			A/C Y OUT, SAT. [illegible]	2/2	7		
20	G-1159B	N908JE	PBI	TEB		1283	JE, GM, CLAIRE, ET	1/1	2 5		
22	"	"	TEB	PBI		1284	JE, ET, AP		2 6		
23	C-172	N2388L	LNA-	FXE			ED AMATO CFI RENEWAL	1/1	1 1		
23	"	"	FXE	LNA			ED AMATO CFI RENEWAL	1/1	5		
25	G-1159B	N908JE	PBI	TIST		1285	JE, GM, AP, SHELLY HARRISON	1/1	2 5		
26	"	"	TIST	TEB		1286	JE, GM, AP, SHELLY HARRISON	1/1	3 8		
OCT 7	"	"	TEB	TIST		1287	JE, SHELLY LEWIS	1/1	3 5		
9	"	"	TIST	PBI		1288	JE, SHELLY LEWIS	1/1	2 6		
11	"	"	PBI	SAF		1289	JE	1/1	3 7		
12	"	"	SAF	TEB		1290	JE, SOPHIE BIDDLE	1/1	3 5		
14	"	"	TEB	BED		1291	JE, GM, AP, AUDREY RAIMBAULT, ET	1/1	7		

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	16/14	42 8		
Amount Forward	6254 / 5955	7618 0	3 3	74 3
Total to Date	6270 / 5969	7660 8	3 3	74 3

Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
OCT 14	G-1159B	N908JE	BED	PBI		1292	JE, GM, ET, AP, AUDREY RAIMBAULT		2.9		
16	"	"	PBI	TIST		1293	JE, GM, AUDREY RAIMBAULT	1/1	2.5		
18	"	"	TIST	TEB		1294	JE, GM, AUDREY, MELINDA LUNTZ	1/1	3.6		
21	"	"	TEB	PBI		1295	JE, GM, ET	1/1	2.7		
27	"	"	PBI	TEB		1296	JE, ET, GWYNDOLYN BECK, MR. BROWN, FREYA WESSING	1/1	2.4		
29	"	"	TEB	PBI		1297	JE, GM, ET, CLAIRE HAZEL		2.4		
31	"	"	PBI	TEB		1298	JE, GM, ET, CLAIRE HAZEL		2.5		
NOV 5	"	"	TEB	BED		1299	JE, SHELLY ANNE LEWIS	1/1	.8		
5	"	"	BED	PBI		1300	JE, SHELLY ANNE LEWIS	1/1	2.8		
9	"	"	PBI	TEB		1301	JE, ET GARY ROXBURGH	1/1	2.6		
11	"	"	TEB	SAF		1302	JE, AP, ALBERTO PINTO, 1 MALE GE		4.0		
11	"	"	SAF	VNY		1303	JE GARY ROXBURGH		1.7		
13	"	"	VNY	SAN		1304	JE GARY ROXBURGH		.7		
13	"	"	SAN	SAF		1305	JE GARY ROXBURGH		1.6		
14	"	"	SAF	TEB		1306	JE, AP, ALBERTO PINTO, 1 MALE GE		3.6		
16	"	"	TEB	PBI		1307	JE GARY ROXBURGH	1/1	2.4		
18	"	"	PBI	TEB		1308	JE	1/1	2.5		
19	"	"	TEB	PBI		1309	JE, MANDY GLISSON, JEAN MICHELLE GATHY		2.5		
22	"	"	PBI	TIST		1310	JE, GM, ET, JEAN MICHELLE GATHY		2.2		
							Page Total	9/7	46.4		
							Amount Forward	6270 5969	7660.8	3.3	74.3
							Total to Date	6279 [illegible]	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

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Date 1999	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
NOV 25	G-1159B	N908JE	TIST	PBI		1311	JE, GM, ET	1/	2 6		
28	"	"	PBI	TEB		1312	JE, GM, ET, AP, GLEN, EVA, CELENA, SUKHOW NANNY, RALPH		2 4		
30	"	"	TEB	SAF		1313	JE, GM, ET, AP, CLARE + VICTORIA HAZEL		3 9		
DEC 3	"	"	SAF	VNY		1314	JE, GM, ET	1/1	1 8		
4	"	"	VNY	PBI		1315	JE, ET		4 6		
7	"	"	PBI	TIST		1316	JE	1/	2 3		
7	"	"	TIST	PBI		1317	RETURN FOR CMP CARDS	●	2 7		
2000 JAN 4	"	"	PBI	TEB		1320	JE, GM, ET, AP, EVA, CELENA, JORDON MICLENDON WNTZ	1/1	2 4		
6	"	"	TEB	PBI		1321	JE, SOPHIE BIDDLE, 1 FEMALE		2 7		
8	"	"	PBI	ABY		1322	JE	1/1	1 2		
8	"	"	ABY	PBI		1323	JE		1 1		
10	"	"	PBI	TEB		1324	JE, SOPHIE, JOEL PASHCOW	1/1	2 4		
12	"	"	TEB	TIST		1325	JE, AP, SOPHIE, SHELLY		3 3		
16	"	"	TIST	TEB		1326	JE, AP, SOPHIE, SHELLY LEWIS	1/1	4 1		
24	206L3	N72PH	PMP	PMP			HOVER AUTOS, FULL AUTOS, STUCK PEDDLES, TAIL ROTOR FAILURE		~~1 5~~		1 5
24	206L3	"	PMP	PMP			EMERGENCY LANDING, 180 FULL AUTOS BOTH DIRECTIONS, ENGINE FAILURE ON TAKE OFF, SLOPES				1 5
25	"	"	PMP	PMP			NO HYDRAULICS, STUCK PEDALS, ETC, SETTLING WITH POWER, CONFINED AREAS				2 6
28	G1159-B	N908JE	TEB	PBI		1327	JE	1/1	2 6		
31	"	"	PBI	SAF		1328	JE, GM, ET, AP FRAMED GLOBE EARTH CLARE HAZEL	1/1	4 1		
							Page Total	4/7	44 2		5 6
							Amount Forward	6279 5976	7707 2	3 3	74 3
							Total to Date	6255	[illegible]	3 3	79 [illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000034

GIUFFRE007088
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Date 2020 FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
2	G1159-B	N908JE	SAF	VNY		1324	JE, GM, GT, AP, FRANCIS CORCEMET, CLARE HAZEL	1 / 1	1 8		
2	"	"	VNY	TEB		1335	GM, ET, AP, CLARE HAZEL		4 7		
3	"	"	TEB	PBI		1331	NO PASSENGERS 72 MONTH INSPECTION OSI PAINT		2 5		
7	206L3	N72PH	PMP	PMP			REVIEWED A-G + M				1 2
8	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP B, G, O - INCLUD N O UNUSUAL ATT				1 5
9	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP G, H, J, S V + DGE MANEUVERS				1 5
9	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP H + I, includ. X-Wind techniques				1 2
11	206L3	N72PH	PMP-NW-PMP				COMMERCIAL PREP C, G, H, I + O				1 6
11	206L3	N72PH	PMP-NW-PMP				CPL PREP COMPLETE REVIEWED I, includ. Extended Glide				1 1
14	206L3	N72PH	PMP	HST							0 6
14	206L3	N72PH	HST	PMP			QUICK REVIEW - G, I, N, + R				1 3
15	206L3	N72PH	PMP	FLL							4
15	206L3	N72PH	FLL	PMP							3
15	206L3	N72PH	PMP	FXE			Commercial Pilot Helicopter Helicopter Checkride Passed [illegible]				8
15	206L3	N72PH	FXE	PMP							2
16	206L3	72PH	PMP-LCL-PMP				IFR / LI				1 3
16	206L3	72PH	PMP-LCL-PMP				IFR / L 7 + 8, includ. 9	1-NDB FXE			1 9
22	206L3	72PH	PMP-FXE-PMP				IFR / L 7, 8, + 12 [illegible]	1-NDB FXE			1 7
23	EC120B	121TH	PBI	PBI			MARK MCAFEE				3

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	7	9 0		16 9
Amount Forward	6238 5983	7751 4	3 3	79 3
Total to Date	6239 5984	7760 4	3 3	96 2

Date 19?? FEB	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	
23	206L3	N72PH	PMP-FXE	PMP			IFR / L7, 8, + 10 [illegible]	[illegible signature]				
24	206L-3	N72PH	PMP-FXE	PMP			IFR / L6, 9, + 10	[illegible signature]				1
25.	206L-3	N72PH	PMP-FXE	PMP			IFR / L7 + 9	[illegible signature]				
26	206L-3	N72PH	PMP-LNA-[illegible]-PMP									2
29	"	"	PMP	FMY			IFR / L6, 7, 9, 10					1
29	"	"	FMY	VRB			11					1
29	"	"	VRB	FXE-PMP			[illegible signature]					1
MAR 2	"	"	PMP-FXE	PMP		PREP	IFR / L1, 3, 4, 5, 9, + 10	[illegible signature]				1
2	"	"	PMP-F45-LNA-PMP			PREP	IFR / L2, 6, 7, 9, + 10	[illegible signature]				1
3	"	"	PMP	PMP		PREP	IFR / L4, 6-8, 16, + 17	[illegible signature]				1
3	"	"	PMP	LNA		PREP	IFR / L6, 8, + 12 (IFR [illegible])	[illegible signature]				
10	"	"	PMP	PMP			IFR REVIEW / L9 + 10	[illegible signature]				
14	"	"	PMP	PMP			[illegible]					1
APR	"	"	PMP-LNA-[illegible]				LEFT SEAT FLYING					
24	G-1159B	N908JE	PBI	PBI		1332	FIRST FLIGHT	✓		5		
MAY 3	"	"	"	"		1333	3 NIGHT TAKE OFF + LANDINGS [illegible] 2 VOR APPROACHES, VOR HOLDING			7		
4	"	"	PBI	TEB		1334	REPOSITION	✓	2	6		
4	"	"	TEB	PBI		1335	[illegible]		2	4		
7	"	"	PBI	TIST		1336	[illegible]	1	2	2		

I certify that the statements made by me on this form are true.

[illegible signature]

	Number of Landings	Airplane	Glider	Helicopter	
Page Total	[illegible]	3 4		15	1
Amount Forward	[illegible]	776 4		3 3	96

Date 2002 MAY	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
8	G1159B	N908JE	TIST	TEB		1331	JE, GM, ET, AP, JEAN LUC BRUNEL, CHRISTINA ESTRADA, LETICIA MARIA BERLINGER	1 /	3 8		
12	"	"	TEB	PBI		1333	JE, GM, ET, AP, PRINCE ANDREW, BODYGUARD, REGINA, 1 MALE	1 / 1	2 4		
15	"	"	PBI	TEB		1339	JE, AP, PAULA EPSTEIN, ALEXANDRA	1 / 1	2 4		
16	"	"	TEB	TIST		1340	JE, SHELLEY LEWIS	1 / 1	3 6		
21	"	"	TIST	TEB		1341	JE, SHELLEY LEWIS	1 / 1	4 0		
30	"	"	TEB	MDW		1342	REPOSITION		1 9		
31	"	"	MDW	TEB		1343	JE, GM		1 7		
JUN 1	"	"	TEB	PBI		1344	JE, GM, ET, AP, 1 FEMALE		2 4		
4	"	"	PBI	TEB		1345	JE, GM, ET, 1 FEMALE	1 / 1	2 4		
9	"	"	TEB	SAF		1346	JE, GM, 1 FEMALE	1 /	3 9		
12	"	"	SAF	VNY		1347	JE	1 / 1	1 7		
14	"	"	VNY	SFO		1348	JE	1 / 1	1 2		
14	"	"	SFO	LAS		1349	JE	1 /	1 2		
15	"	"	LAS	PHX		1350	JE	1 / 1	1 0		
17	"	"	PHX	PBI		1351	JE	/ 1	3 9		
18	"	"	PBI	TEB		1352	JE	1 / 1	2 6		
25	"	"	TEB	TIST		1353	JE, GM, ET, AP, PETER MARINO, 2 FEMALES	1 / 1	3 7		
25	"	"	TIST	TEB		1354	ELIZABETH JOHNSON, FREDERIC & ALEXANDRA FEKKAI, AUDREY BLATISE, R & R MARINO	1 / 1	3 7		
25	"	"	TEB	PBI		1355	REPOSITION		2 4		
							Page Total	14 / 12	49 9		
							Amount Forward	6292 / 5986	7768 8	33	112 6
								6306	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

David Rodgers

CONFIDENTIAL DR_000037

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER
JUN 30	G-1159B	N908JE	PBI	TIST		1356	REPOSITION	1/0	2	8			
30	"	"	TIST	PBI		1357	JE, GM, CT, AP, SOPHIE BIDDLE		2	5			
JUL 1	"	"	PBI	TEB		1358	JE, CT, AP, GM, SOPHIE BIDDLE, [illegible]	1	2	5			
5	"	"	TEB	LFPB		1359	JE, GM	1 1	6	9			
6	"	"	LFPB	LIEO		1360	JE, GM	1	2	0			
9	"	"	LIEO	GMMX		1361	JE, GM	1 1	2	9			
11	"	"	GMMX	GMFF		1362	JE, GM	1 1		9			
11	"	"	GMFF	LEBB		1363	JE, GM	1 1	1	9			
11	"	"	LEBB	EGGW		1364	JE, GM	1	1	7			
12	"	"	EGGW	EGAA		1365	JE, GM	1 1	1	0			
12	"	"	EGAA	BGR		1366	JE, GM	1	6	4			
12	"	"	BGR	TEB		1367	JE, GM		1	1			
14	"	"	TEB	PBI		1368	JE, SHELLEY LEWIS	1 1	2	5			
19	"	"	PBI	TEB		1369	JE, SHELLEY LEWIS, GARY ROXBURGH	1 1	2	5			
19	"	"	TEB	SAF		1370	JE, GM, CT, AP, SOPHIE, JASMINE, GARY ROXBURGH, 1 MALE		4	1			
AUG 2	"	SIMULATOR	JFK	JFK			STEEP TURNS, STALLS, SLOW FLIGHT, REJECTED TAKE-OFF		3	9			
3	"	"	JFK - TEB - SWF				SINGLE ENGINE APPROACHES, ELECTRICAL FAILURES, HYDRAULIC FAILURES		4	0			
4	"	"	JFK - SWF - JFK				ICING, EMERGENCY DESCENT, NO FLAP APPROACHES, ENGINE MALFUNCTIONS		4	1			
21	"	N908JE	PBI	SAF		1378	JE, GM, CT, AP	1	3	5			
							Page Total	12/7	57	2			
							Amount Forward	6306 / 5998 / [illegible]	7818	7	3	3	112

I certify that the statements made by me on this form are true.

[signature]

Date 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
AUG 24	G-1159B	N908JE	SAF	VNY		1379	JE, KELLY SPAMM	✓	1	7				
26	"	"	VNY	TEB		1380	JE, GM, AP	✓	4	9				
31	"	"	TEB	PBI		1381	JE		2	2				
SEP 6	"	"	PBI	TEB		1382	JE	✓1	2	5				
9	"	"	TEB	PBI		1383	JE, GM, ET, AP		2	3				
10	"	"	PBI	TIST		1384	JE, GM, ET, AP, CHERI KRAPE	✓1	2	5				
12	"	"	TIST	TEB		1385	JE, GM, ET, AP, CHERI KRAPE	✓	3	9				
21	"	"	TEB	SAF		1386	JE, GM, AP, JOE PAGANO, 1 FEMALE		4	2				
25	"	"	SAF	VNY		1387	JE, KELLY SPAMM	✓1	1	8				
26	"	"	VNY	TEB		1388	JE, TIFFANY GRAMZA	✓	4	8				
29	"	"	TEB	TIST		1389	JE, PETER MARINO, 1 PERSON	✓1	3	6				
30	"	"	TIST	PBI		1390	JE, PETER MARINO, 1 FEMALE	✓1	2	6				
OCT 3	"	"	PBI	TEB		1391	JE, GM, ET, 1 FEMALE	✓1	2	5				
5	"	"	TEB	PBI		1392	JE, SHELLEY LEWIS		2	4				
10	"	"	PBI	TEB		1393	JE, GM, ET	✓	2	5				
13	"	"	TEB	LGA		1394	REPOSITION FOR PARIS			5				
13	"	"	LGA	LFPB		1395	JE, VOR HOLDING	✓1	7	1				
15	"	"	LFPB	EGBB		1396	JE, SHELLEY LEWIS	✓1	1	3				
17	"	"	EGBB	BGR		1397	JE, SHELLEY LEWIS	✓1	6	4				
							Page Total	13 / 10	59	7				
							Amount Forward	6318 6005	7875	9	3	3	112	(
							Total to Date	6331 6015	7935	6	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL

Date 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
OCT 17	G-1159B	N908JE	BGR	LGA		1398	JE, SHELLEY LEWIS	1	1 3		
20	"	"	PBI	MIA		1400	JE, GM, ET, KELLY SPAMM GARY ROXBURGH		6		
21	"	"	MIA	TIST		1401	JE, GM, ET, KELLY SPAMM, RICARDO LEGORRETA GARY ROXBURGH		2 3		
23	"	"	TIST	EWR		1402	JE, GM, ET GARY ROXBURGH	1/1	3 9		
25	"	"	EWR	EGGW		1403	JE, GM, ET	1/1	6 4		
28	"	"	EGGW	BGR		1404	JE, GM, ET NORTHERN LIGHTS		7 1		
29	"	"	BGR	PBI		1405	JE, GM, ET		3 0		
30	"	"	PBI	TEB		1406	JE, GM, ET	1/1	2 7		
31	"	"	TEB	PBI		1407	JE, SHELLEY LEWIS		1 9		
NOV 5	"	"	PBI	TIST		1408	JE, SHELLEY LEWIS, JESSICA	1/1	2 4		
7	"	"	TIST	TEB		1409	JE, SHELLEY LEWIS, JESSICA BAKER	1/	4 4		
9	"	"	TEB	PBI		1410	JE, ET	1/1	2 4		
12	"	"	PBI	CMH		1411	JE,	1/1	2 2		
12	"	"	CMH	PBI		1412	JE	1/1	2 3		
15	"	"	PBI	SAF		1413	JE, GM, ET		4 2		
16	"	"	SAF	VNY		1414	JE, GM, ET	1/1	1 9		
17	"	"	VNY	SAN		1415	GM, ET	1/	7		
17	"	"	SAN	PBI		1416	JE, GM, ET		4 0		
19	"	"	PBI	BED		1417	JE, GM, ET	1/1	2 6		
							Page Total	11/9	56 3		
							Amount Forward	6331 6015 6342	7935 6	3 3	112 6

I certify that the statements made by me on this form are true.

David Rodgers

Date ~~19~~ 2000	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane		Glider	Helicopter	
NOV 19	G-1159B	N908JE	BED	TEB		1418	JE, SHELLEY LEWIS		1	1			
22	"	"	TEB	DCA		1419	JE, AP, SHELLEY LEWIS	1/1	1	0			
22	"	"	DCA	PBI		1420	JE, AP, SHELLEY LEWIS	1/1	2	2			
28	"	"	PBI	TIST		1421	JE, GM		2	4			
30	"	"	TIST	PBI		1422	JE, GM	1/1	2	7			
DEC 1	"	"	PBI	DFW		1423	JE, GM	1/1	2	7			
1	"	"	DFW	ABQ		1424	JE, GM, RICARDO LEGORRETA	1/1	1	8			
2	"	"	ABQ	SAF		1425	REPOSITION	1/1		5			
2	"	"	SAF	TEB		1426	JE, GM		3	5			
5	"	"	TEB	LFPB		1427	JE, GM, ET, KELLY SPAMM	/1	6	8			
6	"	"	LFPB	EGGW		1428	JE, GM, ET, KELLY SPAMM		1	0			
7	"	"	EGGW	EGYM		1429	JE, GM, KELLY SPAMM, TOM PRITZKER, 1 FEMALE (MARHAM AIR FORCE BASE)			5			
7	"	"	EGYM	EGSH		1430	REPOSITION (SANDRINGHAM NORWICH, ENGLAND)			4			
9	"	"	EGSH	CYQX		1431	JE, GM, ET, KELLY SPAMM (BLOWING SNOW ON RUNWAY)		5	0			
9	"	"	CYQX	PBI		1432	JE, GM, ET, KELLY SPAMM		4	7			
11	"	"	PBI	TEB		1433	JE, GM, ET, VIRGINIA	1/1	2	6			
14	"	"	TEB	TIST		1434	JE, GM, AP, VIRGINIA	1/1	3	5			
14	"	"	TIST	PBI		1435	REPOSITION FOR OPS 2 + TCAS		2	4			
2001 JAN 13	"	"	PBI	PBI		1436	TCAS CERTIFICATION	1/1		7			
							Page Total	9/10	45	5			
							Amount Forward	6342 / 6024	7991	9	33	112	6
								6351					

I certify that the statements made by me on this form are true.

David Rodgers

CONFIDENTIAL DR_000041

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Date ~~19~~ 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER	HELICOPTER
JAN 16	G-1159B	N908JE	PBI	LCQ		1437	JG, GM, ET	✓1		8		
16	"	"	LCQ	TCB		1438	JG, GM, ET	✓1	2	1		
17	"	"	TCB	PBI		1439	JG, SHELLEY LEWIS		2	4		
22	"	"	PBI	TCB		1440	JG, GM, ET, AP	✓1	2	5		
23	"	"	TCB	LFPB		1441	JG, SHELLEY LEWIS	✓1	6	7		
25	"	"	LFPB	CYQX		1442	JG, SHELLEY LEWIS	✓1	5	9		
25	"	"	CYQX	TEB		1443	JG, SHELLEY LEWIS		2	7		
26	"	"	TEB	PBI		1444	JG, GM, ET, VIRGINIA ROBERTS		2	4		
18	C172	N1446V	~~PBI~~ LNA	PBI LNA			C172 VOUT PETE SORENSON	2/2		4		
18	"	"	LNA	LCQ			B727 CLOSING N505LS	✓1	2	4		
19	"	"	LCQ	MCO			JONATHAN MANO – INSTRUMENT COMPETENCY CHECK – CATIS CECJURY		2	0		
19	"	"	MCO	LNA			→		1	9		
27	G1159B	N908JE	PBI	TIST		1445	JG, GM, ET, VIRGINIA ROBERTS	✓	2	4		
30	"	"	TIST	PBI		1446	JG, GM, ET, VIRGINIA ROBERTS	✓1	2	6		
FEB 3	C-421B	N908GM	SAF	DFW			JONATHAN MANO - FAR 61.31(G) SATISFACTORY QUALIFICATION FL270	✓	3	0		
17	B-727-200	SIMULATOR	MEM	MEM			STALLS, STEEP TURNS, ENGINE START, TURNS, CLIMBS, DESCENTS, V1 ENGINE FAILURE,		2	5		
18	"	"	"	"			APU FIRE, RTO, ENGINE FIRE, ONE & TWO ENGINE APPROACH, FLAP ASSYMETRY, NON RADAR APPROACH		3	0		
19	"	"	DFW	MEM			PUSH BACK, DUTCH ROLL, EMERGENCY DESCENT, CIRCLING APPROACH, MANUAL REVERSION		2	2		
20	"	"	MEM	MEM			JAMMED STABILIZER, SINGLE ENGINE LANDING, 2 ENGINE GO AROUND, ICING, STEEP TURNS, HOLDING		3	5		
							Page Total	10/9	52	4		
							Amount Forward	6351 6024	8637	4	33	112
							Total to Date	6361	[illegible]			

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000042

Date 2001	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter
21	B-727-200	[illegible]	DFW	DFW			RUNWAY STABILIZER, MANUAL GEAR EXTENSION, FUEL DUMPING, RTO, [illegible], PATTERNS		2 5		
22	"	SIMULATOR	MGM	MGM			STEEP TURNS, STALLS, SINGLE ENGINE [illegible], 1+2 ENGINE APPROACHES, RTO, [illegible]		2 5		
23	"	"	"	"			B727 CHECK RIDE		2 4		
23	C-421B	N908GM	DFW	ADS			JONATHAN MANO - HIGH DENSITY AIRPORT OPERATIONS	✓	6		
23	"	"	ADS	PNS			JONATHAN MANO - SID, ICING OPERATIONS, FUEL MANAGEMENT, PERFORMANCE CHARTS	✓	3 2		
MAR 3	"	"	PNS	PBI			JONATHAN MANO - LOST COMMUNICATIONS PROCEDURES, WEIGHTS & BALANCE		3 1		
3	"	"	PBI	LCQ			KRISTY ROGERS - CLIMBS, DESCENTS, STRAIGHT & LEVEL [illegible]		1 9		
3	"	"	LCQ	LAL			KRISTY ROGERS - TURNS, STRAIGHT+LEVEL		1 3		
3	"	"	LAL	PBI			KRISTY ROGERS - DESCENTS, S+L		1 1		
5	G-1159B	N909JE	PBI	CYJT		1464	JG, GM, GS, VIRGINIA ROBERTS, GARY ROXBURGH		3 8		
6	"	"	CYJT	LFPB		1465	JG, GM, GT, VR, GARY ROXBURGH	✓	5 3		
6	"	"	LFPB	LGGR		1466	JG, GM, GT, VR, ALBERTO + LDPOA PINTO, 1 FEMALE, RICARDO LEGORRETA, FCT	✓	2 5		
6	"	"	LGGR	GMTT		1467	JG, GM, GT, VR, ALBERTO + LDPOA PINTO, 1 FEMALE	✓	8		
9	"	"	GMTT	EGGW		1468	JG, GM, GT, VR RGR	✓	2 8		
11	"	"	EGGW	BGR		1469	JG, GM, GT, VR RGR		6 6		
11	"	"	BGR	TEB		1470	JG, GM, GT, VR RGR		1 2		
14	C-421B	N908GM	PBI	FLL			LARRY MORRISON - TAXIING, S+L, CLIMBS, DESCENTS, TURNS	✓	6		
14	"	"	FLL	PBI			LARRY MORRISON, CLIMBING + DESCENDING TURNS S+L	✓	4		
15	G-1159B	N909JE	TEB	ISP		1471	JG, GM, AP, ALBERTO [illegible], [illegible] RGR	✓	6		
							Page Total	8/7	43 6		
							Amount Forward	6361 / 6043	8089 8	3 3	112 6
							Total to Date	6369 / 6050	8133 4	3 3	112 6

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000043

Date 01 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
MAR 15	G-1159B	N909JE	ISP	LCQ		1472	JE, GM, AP, ALEXIS WALLACE?, DANU KUCUKKOYLU RGR	1/1	2	6				
15	"	"	LCQ	PBI		1473	JE, GM, AP, AW, BK RGR	1/1		9				
16	"	"	PBI	/A1A		1474	JE, GM, AP, AW, BK, CHERI LYNCH RGR	1/1		7				
16	"	"	MSA	TIST		1475	JE, GM, AP, AW, BK, CL, ED TUTTLE RGR	1/	2	2				
19	"	"	TIST	LGA		1476	JE, GM, AP, AW, BK, CL, E TUTTLE RGR	1/	3	8				
22	"	"	LGA	PBI		1477	JE, GM, ES, JOE PAGANO, EVA, CELINA, JORDAN DUBIN, MYA DUBIN & NANNY AW RGR	1/1	2	4				
23	C-421B	N908GM	PBI	OPF			KRISTY RODGERS - S&L, TURNS	1/1		6				
23	"	"	OPF	FLL			KRISSY RODGERS - S&L, TURNS	1/1		4				
23	"	"	FLL	PBI			JONATHAN MANO - ILS - PBI			6				
24	"	"	PBI	ISM			JONATHAN MANO - IFR CROSS COUNTRY STAR, CROSSING RESTRICTIONS	1/1	1	0				
24	"	"	ISM	PBI			JONATHAN MANO - IFR CROSS COUNTRY ATC, MISCOMMUNICATIONS.	1/1	1	1				
27	G-1159B	N909JE	PBI	TEB		1478	JE, GM, ET, VR, 2 FEMALES, DANU KUCUKKOYLU RGR	1/1	2	5				
29	"	"	TEB	SAF		1479	JE, GM, AP, VR, BK, MARVIN MINSKY, HENRY JARECKI		4	1				
31	"	"	SAF	PBI		1480	JE, GM, AP, VR, NADIA BJORLIN, HENRY JARECKI, MARVIN MINSKY	1/	3	3				
APR 1	"	"	PBI	LCQ		1481	JE, GM, AP	1/1	1	0				
1	"	"	LCQ	TEB		1482	JE, GM, AP		2	1				
3	"	"	TEB	GAI		1483	JE, HEATHER MANN, LYDIA	1/1		9				
3	"	"	GAI	TEB		1484	JE, HEATHER MANN, LYDIA			8				
4	"	"	TEB	BED		1485	JE, RHONDA	1/1		8				
							Page Total	15/12	51	9				
							Amount Forward	6364 / 6650	8133	4	3	3	112	6
							Total to Date	6384 / 6662	8165	3	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
APR 4	G-1159B	N909JE	BED	TEB		1486	JE			9				
5	"	"	TEB	PBI		1487	JE, GT, BK		2	3				
6	C-421B	N908GM	PBI	FLL			LARRY MORRISON - TAXI, S+L, CLIMBS TURNS, DESCENTS, LANDING	1/		7				
6	"	"	FLL	PBI			LARRY MORRISON - TAKE OFF + LANDING TAXI, CHECK LIST, CLIMBS TURNS, DESCENT	1/1		6				
9	G-1159B	N909JE	PBI	ACY		1488	JE, GT, VR, BK, JOANN	1/	2	4				
9	"	"	ACY	TEB		1489	JE, GT, VR, BK, JOANN			7				
11	"	"	TEB	TIST		1490	JE, GM, AP, BK, VR, JOANN	1/	3	5				
16	"	"	TIST	PBI		1491	JE, GM, AP, VR, BK, GWENDOLYN BECK	1/1	2	7				
17	"	"	PBI	TEB		1492	JE, GM, GT, AP, BK, GB, JOEL PASHKOW, MITCHELL, KALL, [illegible]	1/1	2	5				
20	"	"	TEB	PBI		1493	JE, GM, GT, BK		2	3				
23	"	"	PBI	ORL		1494	JE, GM, GT, KYLE	1/1		8				
23	"	"	ORL	TEB		1495	JE, GM, GT, KYLE, HENRY JARECKI, STAX	1/	2	2				
27	"	"	TEB	SAF		1496	JE, BK		3	9				
29	"	"	SAF	VNY		1497	JE, BK, KELLY BOVINO	1/1	1	7				
MAY 2	"	"	VNY	SAN		1498	JE	1/1		7				
2	"	"	SAN	LIT		1499	JE	1/1	3	0				
3	"	"	LIT	ADS		1500	JE	1/1		9				
3	"	"	ADS	SAT		1501	JE, VIRGINIA ROBERTS	1/1		9				
5	"	"	SAT	PBF		1502	JE, VR GARY ROXBURGH	1/1	2	4				
							Page Total	14/11	35	1				
							Amount Forward	6384 / 6062	8165	3	3	3	112	6
							Total to Date	6398 / [illegible]	[illegible]	4	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000045

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
MAR 7	G-1159B	N909JE	PBI	CHO		1503	JE, GM, CT, INCA DOCRREG	1/1	2	0				
7	"	"	CHO	TEB		1504	JE, GM, CT, INCA DOCRREG		1	1				
10	C421B	N908GM	PBI	MCN			JONATHAN MAND - CROSS COUNTRY IFR, LARRY MORRISON, PATSY, KRISTY	1/1	2	6				
10	"	"	MCN	27K			JONATHAN MAND - IFR CROSS COUNTRY LARRY MORRISON, PATSY, KRISTY	1/1	2	1				
10	"	"	27K	OSU			JONATHAN MAND - IFR XC LARRY MORRISON	1/1	1	2				
10	"	"	OSU	IUY			JONATHAN MAND - GPS OPERATIONS		1	2				
11	"	"	IUY	27K			NO PASSENGERS	1/1		7				
12	"	"	27K	IMS			NO PASSENGERS	1/1		7				
13	"	"	IMS	GNV			RYAN COOMER - CLIMBS, TURNS, DESCENTS, FO. FL PATSY, KRISTY, ALYSSA	1/1	3	0				
13	"	"	GNV	PBI			RYAN COOMER - RADIO COMMUNICATIONS, CABIN PATSY, KRISTY, ALYSSA		1	8				
14	G1159B	N909JE	TIST	TEB		1506	JE, GM, CT, BK, VR 1 FEMALE	1/1	3	8				
20	C-421B	N908GM	PBI	ISM			PATSY, KRISTY, ALYSSA KRISTY - COCKPIT SYSTEMS, MP, PROPS, MIXTURE	1/1	1	1				
20	"	"	ISM	PBI			PATSY, KRISTY, ALYSSA	1/	1	1				
24	G-1159B	N909JE	TEB	PBI		1507	JE, GM, CT, AP, FEMALE	1/1	2	6				
25	C-421B	N908GM	PBI	LAL			PATSY, KRISTY, ALYSSA	1/1	1	3				
26	"	"	LAL	MCN			PATSY, KRISTY, ALYSSA [illegible] FOR → TEMPERATURE COMPENSATING, TAXI	1/1	1	8				
27	"	"	MCN	ISM			PATSY, KRISTY	1/1	1	8				
28	"	"	ISM	PBI			PATSY, KRISTY - GPS OPERATIONS PERFORMANCE - CRUISE STAR	1/1	1	1				
28	G1159B	N909JE	PBI	TEB		1508	JE, GM, CT, AP, JOEL [illegible] CON, 1 MALE 2 FEMALE	1/1	2	5				
							Page Total	16 15	33	5				
							Amount Forward	6398 6073	8200	4	3	3	112	6
							Total to Date	6414	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL

Date 19 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
4-2	B727-31	N505LS	LCQ	PBI			REPOSITION GEORGE WALLGRIZ	1/	1 0		
JUN 6-1	G-1159B	N909JE	TEB	PBI		1509	JE, GM, ET, AP, BANU KUCUK KOYLU	1/1	2 6		
3	"	"	PBI	TIST		1510	JE, VIRGINIA ROBERTS, BAN KUCUKOYLU	1/	2 4		
5	"	"	TIST	TEB		1511	JE, VR, BK	1/1	3 8		
8	"	"	TEB	CYUL		1512	JE, GM, NAOMI CAMPBELL, REBECCA WHITE, ANDAL LAVALLEE, ANNA MOLOVA, DAVID RINALDO	1/1	1 1		
12	"	"	CYUL	TEB		1513	REPOSITION (AN BLOOD ADR DOCT)	1/1	1 1		
12	"	"	TEB	PBI		1514	JE	1/1	2 3		
13	"	"	PBI	TEB		1515	JE, CAROL	1/1	2 4		
15	"	"	TEB	PBI		1516	JE, GM, SHERIDAN, CAROLYN, 1 FEMALE		2 3		
18	"	"	PBI	TEB		1517	JE, GM, 1 FEMALE	1/1	2 5		
22	"	"	TEB	LFPO		1518	JEFFREY, GM, CRISTALLE WASCHE, EKATERINA GRINEVA	1/1	7 0		
23	"	"	LFPO	LFMN		1519	JE, GM, 1 FEMALE	1/1	1 2		
25	"	"	LFMN	LIML		1520	JE, GM, 1 FEMALE	1/1	7		
26	"	"	LFML	LFPB		1521	JE, GM	1/1	1 4		
28	"	"	LFPB	LPAZ		1522	JE, GM, ET, ED TUTTLE	1/1	3 9		
28	"	"	LPAZ	TIST		1523	JE, GM, ET, ED TUTTLE		6 0		
JUL 4	"	"	TIST	PBI		1524	JE, AP, VR, 1 FEMALE	1/1	2 5		
8	"	"	PBI	TEB		1525	JE, GM, ET, AP, VR, SHERIDAN, 1 FEMALE GIBSON BUTH GARY ROXBURGH	1/1	2 7		
11	"	"	TEB	CPS		1526	JE, GM, ET, VR GARY ROXBURGH		2 3		
							Page Total	16/14	49 2		
							Amount Forward	6414 / 6088	8233 9	3 3	112 6
							Total to Date	6430 / 6102	8283 1	3 3	112 6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000047

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Date 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider		Helicopter
JUL 11	G-1159B	N909JE	CPS	SAF		1527	REPOSITION. PITOT STATIC LEAK GARY ROXBURGH	1/1	2 2			
16	"	"	SAF	TEB		1528	JE, ET, GM, VR GARY ROXBURGH	1/	3 5			
23	"	"	PBI	TIST		15[illegible]	JE, SHELLEY LEWIS	1/1	2 5			
28	"	"	TIST	PBI		1531	JE, VIRGINIA ROBERTS	1/1	2 6			
29	"	"	PBI	ISP		1532	JE	1/1	2 5			
29	"	"	ISP	TEB		1533	JE	1/	7			
AUG 1	"	"	TEB	PBI		1534	JE, GM, ET, 1 FEMALE	1/1	2 4			
3	B-727-31	N908JE	JAX	PBI			MIKE DONOVAN FROM RIGHT SEAT	4/4	1 4			
4	B-727-100	PAN AM SIMULATOR	MDB	MFA			NIGHT CURRENCY		1 0			
5	G-1159B	N909JE	PBI	TEB		1535	JE, GM, DP, ET, TAYLOR	1/1	2 6			
5	"	"	TEB	PBI		1536	NO PASSENGERS		2 3			
7	B-727-31	N908JE	PBI	LGA		1	MIKE DONOVAN	1/1	2 6			
7	"	"	LGA	ABQ		2	JE, GM, ET, DP, 2 FEMALES	1/1	4 0			
14	C-421B	N908GM	PBI	JAN			JONATHAN MANO - INSTRUMENT COMPETANCY CHECK SATISFACTORY	1/1	3 9			
14	"	"	JAN	AMA			JONATHAN MANO - LDA WITH GS 15 KNOT XWIND LANDING	1/1	3 6			
14	"	"	AMA	ØEØ			JONATHAN MANO -	1/1	1 7			
15	"	"	ØEØ	ABQ			JONATHAN MANO - HIGH DENSITY ALTITUDE OPERATIONS	1/1	5			
15	"	"	ABQ	2UFRO			JONATHAN MANO - SHORT FIELD [illegible] OPERATIONS	1/1	7			
16	B-727-31	N908JE	ABQ	PBI		6	JE, GM, ET, AP, FEMALE, JONATHAN MANO	1/	3 8			
							Page Total	20/17	44 5			
							Amount Forward	6430 6162	8293 1	3	3	112 6
							Totals to Date	6450	[illegible]	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000048

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
AUG 19	B-727-31	N908JE	PBI	HPN		7	JE, GM, ET, AF, FLEUR PERRUVAL, GIL, SKY, ROLAN	✓	2.5		
24	"	"	HPN	PBI		8	JE, GM, BANU KOGALKOYLU	✓	2.4		
27	"	"	PBI	HPN		9	JE, GM, BK	✓	2.6		
29	"	"	HPN	TIST		10	JE, GM, GS, AP, BK	1/1	3.7		
30	G-1159B	N909JE	PBI	PBI			3 ILS APPROACHES SAFETY PILOT LARRY VISOSKI	3/3	.6		
SEP 3	B-727-31	N908JE	TIST	HPN		11	JE, GM, ET, AF, BK, SARAH KELLEN, ALEXANDRA DEXON	1/1	3.7		
6	"	"	HPN	PBI		12	JE, GM, ET, BK, 1 FEMALE		2.1		
9	"	"	PBI	HPN		13	JE, GM, ET, BK	✓	2.7		
15	"	"	HPN	PBI		14	JE, GM, ET, KAREN CASEY, LISA	1/1	2.6		
JUN 4	C-172	N1446V	LNA	LNA			AL PERRELLA - TAXI, TAKEOFF, TURNS, CLIMBS, DESCENTS	4/4	.9		
SEP 19	B-727-31	N908JE	PBI	HPN		15	JE, GM, ET	1/1	2.7		
21	"	"	HPN	CYQX		16	JE, GM, ET		2.2		
22	"	"	CYQX	LFPB		17	JE, GM, ET	✓	4.9		
25	"	"	LFPB	CYQX		18	JE, ET, ED TUTTLE		5.5		
25	"	"	CYQX	HPN		19	JE, ET, ED TUTTLE		3.0		
28	"	"	HPN	PBI		20	JE, ET, PAULA EPSTEIN		2.7		
OCT 5	"	"	PBI	ABQ		21	JE, GM, SARAH KELLEN	1/1	4.0		
8	"	"	ABQ	HPN		22	JE, GM, SK, 2 FEMALES	✓	3.7		
8	"	"	HPN	JAX		23	NO PASSENGERS		2.2		
							Page Total	17/14	55.0		
							Amount Forward	6450/6119	8327.6	33	112
							Total to Date	6467/[illegible]	8382.6	3[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL

Date 19__ 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
OCT 15	C172R	N3955SP	LNA	LNA				3/3	5		
15	"	N3955P	LNA-BCT-LNA				LARRY MORRISON - BFR SATISFACTORY STALLS, MCA, STEEP TURNS, EMERGENCY LANDING	4/4	1 3		
9	B-727-31	N908JE	JAX	LCQ		24	NO PASSENGERS	1/1	5		
10	G-1159B	N909JE	PBI	TEB		1538	NO PASSENGERS	0/0	2 5		
11	"	"	TEB	PBI		1539	JE, SARAH KELLEN		2 3		
15	"	"	PBI	TEB		1540	JE, GM, SK, LARRY, STEVE, 1 FEMALE	1/	2 4		
17	"	"	TEB	BED		1541	JE, BONNIE	1/1	8		
17	"	"	BED	TEB		1542	JE, BONNIE		1 0		
18	"	"	TEB	TIST		1543	JE, GM, AP, SK, 2 FEMALES		3 5		
23	"	"	TIST	TEB		1544	JE, GM, AP, SK, SHERIDAN GIBSON, ALEXEA WALLACE	1/1	4 0		
26	"	"	TEB	PBI		1545	JE, CT, SK, SHERIDAN GIBSON, 2 FEMALES MOLLY EMMA + SHERIDAN		2 6		
30	"	"	PBI	LCQ		1546	JE, SARAH KELLEN, JULIE	1/1	1 0		
30	"	"	LCQ	TEB		1547	JE, SK, JULIE	1/1	2 0		
NOV 3	"	"	TEB	SAF		1548	JE, GM, SK	1/1	4 0		
5	"	"	SAF	ASE		1549	JE, GM, SK	1/1	8		
5	"	"	ASE	PBI		1550	JE, GM, SK	1/	3 7		
6	"	"	PBI	CMH		1551	JE, SK BELLA WEXNER'S FUNERAL	1/1	2 4		
6	"	"	CMH	TEB		1552	JE, SK		1 4		
9	"	"	TEB	LCQ		1553	JE, AP, SK, JULIE	1/1	2 2		
							Page Total	18 16	38 9		
							Amount Forward	6467 6133	8382 6	3 3	112 6
							Total to Date	6485	8421 5	3 3	11[illegible] 1

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000050

GIUFFRE007104
CONFIDENTIAL

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOP
9	G-1159B	N909JE	LCQ	PBI		1554	JE, AP, SK, JULIE	1/1	1 0		
12	"	"	PBI	TEB		1555	JE, GM, AP, JOEL PASHCOW, JULIE SHAY	1/	2 5		
15	"	"	TEB	PBI		1556	JE, GM SARAH KELLEY, MCLINDAMUNE + 1 FEMALE		2 5		
17	B-727-31	N908JE	LCQ	PBI		25	REPOSITION FROM PAINT (TIMCO)	1/1	9 9		
18	"	"	PBI	CYQX		26	JE, GM, SK	1/	4 3		
18	"	"	CYQX	LFPB		27	JE, GM, SK	/1	4 9		
23	"	"	LFPB	LIML		28	JE, GM, SK	1/1	1 2		
23	"	"	LIML	LIPR		29	JE, ~~[illegible]~~ EDWARDO	1/1	8		
23	"	"	LIPR	LIML		30	JE, EDWARDO	1/1	9		
24	"	"	LIML	EGGW		31	JE, GM, SK		1 7		
26	"	"	EGGW	HPN		32	JE, GM, SK		7 9		
30	"	"	HPN	PBI		33	JE, SK, GWENDOLYN BECK, JOEL PASHCOW, KAREN CASEY	1/	2 5		
DEC 4	"	"	PBI	ISP		34	JE, SK	1/	2 5		
4	"	"	ISP	PBI		35	JE, AP	1/	2 7		
9	"	"	PBI	TIST		36	JE, GM, AP, 1 FEMALE	1/	2 2		
13	"	"	TIST	HPN		37	JE, GM, SK, AP, GEOFF TINTAY, CHRISTALLE WASCHE, CHAUN TAGMAYER	1/	4 0		
15	"	"	HPN	CMH		38	JE, SHELLEY LEWIS, 2 FEMALES 1 MALE	1/	1 5		
16	"	"	CMH	PBI		39	JE		2 1		

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	7/6	22 6		
Amount Forward	6485 / 6149	8421 5	3 3	112 6
Total to Date	6492 / 6155	8450 1	3 3	112 6

Date 2001 NOV	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER
4	C-421B	N908GM	ZORRO	SAF			TATIANNA, 2 MEN (ITALIAN PAINTERS)	1/1		5			
4	"	"	SAF	ZORRO			TATIANNA, 2 MEN ITALIAN PAINTERS	1/1		5			
4	"	"	ZORRO	ZORRO			LARRY VISOSKI TAKING PICTURES OF JEE & LV HOUSE	1/1		5			
30 DEC	B-727-31	N908JE	HPN	PBI		33	JE, SK, GB, JP, KC	1/	2	5			
4	"	"	PBI	ISP		34	JE, SK	1/	2	5			
8	"	"	ISP	PBI		35	JE, AP	1/	2	7			
9	"	"	PBI	TIST		36	JE, GM, AP, 1 FEMALE	1/	2	2			
13	"	"	TIST	HPN		37	JE, GM, SK, AP, GT, CW, CP	1/	4	0			
15	"	"	HPN	CMH		38	JE, SL, 2 FEMALES 2 MALES	1/	1	5			
16	"	"	CMH	PBI		39	JE		2	1			
17	"	"	PBI	TIST		40	JE, GM, SK, 1 FEMALE	1/1	2	6			
26	"	"	TIST	TLPL		41	JE, GM, SK, AP, FLEUR PERRY LANE BOB BRESLEY	1/1	1	1			
26	"	"	TLPL	PBI		42	JE, GM, SK, AP, FLEUR PERRY LANE BOB BRESLEY	D/O	3	6			
30	"	"	PBI	TIST		43	JE, GM, APSK, 1 FEMALE		2	4			
2002 JAN 6	"	"	TIST	EWR		44	JE, GM, SK, AP, ALEXIA WALLABRO, CINDY LOPEZ	1/	4	1			
11	"	"	EWR	PBI		45	JE, GM, ROGER, WARREN, MARGARET, MCCENTYRE	1/1	2	0			
13	G-1159B	N909JE	PBI	MBPV		1557	JE, GM	1/1	1	5			
13	"	"	MBPV	PBI		1558	JE, GM		1	7			
14	B-727-31	N908JE	PBI	LGA		46	JE, GM	1/	2	2			
							Page Total	15 / 7	40	8			
							Amount Forward	6492 / 6155	8450	1	3	3	112
							Total to Date	6507 / [illegible]	8490	9	3	3	112

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

CONFIDENTIAL DR_000052

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
JAN 15	B-727-31	N908JE	LGA	BED		47	JE	1/1		7				
15	"	"	BED	HPN		48	JE, JESSICA			8				
17	"	"	HPN	TIST		49	JE, GM, SK, AP, CINDY LOPEZ, JOANNE, 1 FEMALE		3	4				
20	"	"	TIST	PBI		50	JE, GM, SK, AP, CINDY LOPEZ JOANNE MALES & KITTY ALEXANDER, STALEY TREUKSINGH	1/1	2	6				
22	"	"	PBI	HPN		51	JE, GM, SK, AP, CINDY LOPEZ JOANNE	1/	2	5				
25	"	"	HPN	PBI		52	JE, GM, SK, AP, ALBERTO PINTO, YVES PICKARDT, STEVE SHERIDAN, 3 FEMALE		2	7				
27	"	"	PBI	TIST		53	JE, GM, AP, SK, ED TUTTLE, 1 MALE, 1 FEMALE	1/	2	4				
30	"	"	TIST	JFK		54	JE, GM, SK, AP, ED TUTTLE, CINDY LOPEZ	1/	3	7				
FEB 5	"	"	JFK	PBI		55	JE, GM, SK, AP, 1 MALE, 1 FEMALE	1/1	2	8				
9	"	"	PBI	MIA		56	JE, SK, AP			7				
9	"	"	MIA	HPN		57	BILL CLINTON, 4 SECRET SERVICE, 2 MALES, 1 FEMALE, JE, GM, SK, AP		2	6				
10	"	"	HPN	LFPB		58	JE, GM, SK, AP, FLEUR PERRYLANE, MARK LLOYD	/1	6	5				
13	"	"	LFPB	ESSA		59	JE, SK	1/1	2	2				
14	"	"	ESSA	LIML		60	JE, SK	1/	2	4				
15	"	"	LIML	EGGW		61	JE, SK		1	8				
15	"	"	EGGW	BGR		62	JE, GM, SK		7	2				
16	"	"	BGR	PBI		63	JE, GM, SK		3	5				
18	G-1159B	N909JE	PBI	ABY		1559	JE	1/1	1	4				
18	"	"	ABY	PBI		1560	EMPTY	1/1	1	1				
							Page Total	10 7	51	0				
							Amount Forward	6507 6162	8490	9	3	3	112	6
							Total to Date	6517 6169	8541	9	3	3	112	6

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000053

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Date ~~19~~ 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOP.
FEB 13	B-727-31	N908JE	PBI	ABY		64	GM, SK, GLEN DUBIN, 2 FEMALES RICHARD COOK	✓	1	3			
14	"	"	ABY	JFK		65	JE, GM, SK, GLEN DUBIN, 2 FEMALES RICHARD COOK		2	1			
20	"	"	JFK	MRY		66	JE, SK, GERALDINE LAYBOURNE, KIT LAYBOURNE, STEVEN SPIELER, NINA + TIM ZAGAT	✓/	5	9			
23	~~"~~	~~"~~	~~MRY~~	~~VNY~~		66	DAVID ROCKWELL, CAROLYN MILLER, MICHAEL WOLF, DANIEL DENNETT, RICHARD & JOHN BROCKMAN, KATINKA MATSON, CANDY KELLY BOVINO, RICHARD COOK						
23	"	"	MRY	VNY		67	JE, SK, KELLY BOVINO, NINA + TIM ZAGAT, 6 OTHER PASSENGERS	✓/		8			
23	"	"	VNY	JAX		68	B CHECK FMS, ENROUTE RAPID PROCEDURES LARRY MORRISON S+L, ↑, ↓, ↑, LANDING	✓	4	2			
25	G-HSAB	N909JE	~~TEB~~ PBI	~~ABQ~~ TEB		1561	ROGER, SLOANE + SPENCER BARNETT, ARLENE (NANNY)	✓/	2	5			
25	"	"	TEB	ABQ		1562	GM	✓/	4	3			
28	B-727-31	N908JE	JAX	PBI		71	B CHECK	✓/	1	2			
MAR 6	B-727-200	SIMULATOR	MIA	MIA			STEEP TURNS, STALLS, HOLDING,		2	0			
7	"	"	"	"			EMERGENCY DESCENT, RTO, UNUSUAL ATTITUDES, ENGINE FAILURES, MISSED APPROACH		2	0			
7	"	"	"	"			EMERGENCY DESCENTS, 2 ENGINES OUT, WINDSHEAR, HYDRAULIC FAILURES		2	0			
8	"	"	"	"			EMERGENCY DESCENT, HOLDING, ENGINE FIRE, WHEEL WELL FIRE		2	0			
10	B-727-31	N908JE	TIST	JFK		72	JE, GM, SK, AP, LENNY, 2 FEMALES	✓	4	1			
14	"	"	JFK	PBI		73	JE, SK, JOE PAGANO, JULIE, TODD		2	5			
17	"	"	PBI	JFK		74	JE, SK, JOE PAGANO, JULIE, TODD, 1 FEMALE	✓	2	6			
19	"	"	JFK	EGGW		75	BILL CLINTON, DOUG BANDS, 3 SECRET SERVICE JE, GM, SK	/1	6	7			
21	"	"	EGGW	JFK		76	BILL CLINTON, DOUG BANDS, 10 SECRET SERVICE JE, GM, SK, NAOMI CAMPBELL, 1 MALE		7	8			
22	"	"	JFK	PBI		77	JE, NICOLE JUNKERMANN SEPARATE FOR GM		2	6			
							Page Total	89/6	56	6			
							Amount Forward	6517 6169	8541	9	3	3	112
							Total to Date	6526	8544	[illegible]	3	3	112

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000054

Date 19__ 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
APR 1	B-727-31	N908JE	PBI	TIST		78	JE, GM, SK, AP, 2 FEMALES — SCAN KEO FOR LV	1/1	2 3		
5	"	"	TIST	PBI		79	SCAN KEO FOR LM	1/1	2 7		
5	"	"	PBI	IAD		80	SCAN KEO FOR LM		2 1		
6	"	"	IAD	PBI		81	SCAN KEO FOR LM	1/1	2 8		
8	"	"	PBI	JFK		84	JE, SK, SHELLEY LEWIS	2/1	2 5		
20	B-727-200	SIMULATOR	MIA	MIA			PREFLIGHT, TR LOSS, CSD LOW OIL PRESSURE AND DISCONNECT, START VALVE FAILURE, HOT START		2 0		
22	"	"	"	"			NO APU START, LOSS OF ALL GENERATORS, STAB TRIM RUNAWAY, MANUAL GEAR EXTENSION		2 0		
23	"	"	"	"			APU FIRE, BATTERY START, CROSS BLEED START, ENGINE FIRE, ENGINE SHUTDOWN		2 0		
24	"	"	"	"			INFLIGHT START, FUEL DUMPING, SYSTEM B LOSS, ELECTRICAL SMOKE FIRE, SYSTEM A & B LOSS		2 0		
25	"	"	"	"			TWO GENERATORS INOPERATIVE, TWO ENGINES INOPERATIVE, ENG. FIRE, LOW OIL PRESSURE/CONST.		2 0		
26	"	"	"	"			YAW DAMPER FAILURE, APU FIRE, LED ABNORMAL, LOSS OF ALL GENERATORS, ENGINE FIRE		2 0		
27	"	"	"	"			TR LOSS, LOSS OF ALL GENERATORS, SMOKE IN AIR. COND. ON CABIN, SYSTEM A LOSS, STRUCTURAL HEAT		3 0		
29	B-727-31	N908JE	PBI	ABQ		90	JE, GM, SK — PESC ROSTOCK		4 1		
MAY 2	"	"	ABQ	JFK		91	JE, GM, SK	1/	3 2		
4	"	"	JFK	PBI		92	JE, SHELLY LEWIS	1/1	2 4		

TOTALS REPORTED TO

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	7/5	36 6		
Amount Forward	6526 / 6175	8598 5	3 3	112 6
Total to Date	6533 / 6180	8635 1	3 3	112 6

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Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane		Glider	Helicopter
JAN 21	N9046GM	C-421B	PBI	FXE			D.O. AA BROTHERS AVIATION TO HAVE ENGINES SET UP		1/1		6		
MAY 11	N908JE	B-727-31	PBI	JFK		93	JE, SK		1/1	2	5		
"	B-727-31	N908JE	JFK	LFPB		94	JE, GM, SK		/1	7	2		
13	"	"	LFPB	LFPG		95	REPOSITION				5		
13	"	"	LFPG	EGGW		96	JE, GM, SK				8		
16	"	"	EGGW	LFMN		97	JE, GM, SK		1/1	1	8		
19	"	"	LFMN	UNNT		98	JE, GM, SK		1/	6	7		
20	"	"	UNNT	RJTA		99	JE, GM, SK	RATINGS	/1	6	5		
22	"	"	RJTA	VHHH		100	JE, GM, SK, PRESIDENT BILL CLINTON, MIKE, DOUG BAND, JANICE, JESSICA			4	0		
23	"	"	VHHH	ZGSZ		101	SAME AS ABOVE	PETE RATHGEB			4		
23	"	"	ZGSZ	WSSS		102	SAME AS ABOVE	PETE RATHGEB		3	4		
25	"	"	WSSS	VTBD		103	SAME AS ABOVE	PETE RATHGEB		2	2		
25	"	"	VTBD	WBSB		104	SAME AS ABOVE	PETE RATHGEB		2	6		
27	"	"	WBSB	WRRR		105	JE, GM, SK	PETE RATHGEB	1/1	2	1		
29	"	"	WRRR	VCBI		106	JE, GM, SK	PETE RATHGEB		5	2		
29	"	"	VCBI	OMDB		107	JE, GM, SK	PETE RATHGEB		4	4		
30	"	"	OMDB	LFPB		108	JE, GM, SK	PETE RATHGEB		3	8		
31	"	"	LFPB	EGGW		109	JE, GM, SK	PETE RATHGEB	1/1	1	0		
JUN 7	"	"	EGGW	EIDW		110	REPOSITION			1	7		
								Page Total	6/7	57	4		
								Amount Forward	6533 / 4180	8635	1	33	112 6
								Total to Date	6539	[illegible]		[illegible]	[illegible]

I certify that the statements made by me on this form are true.

[signature]

CONFIDENTIAL DR_000056

GIUFFRE007110
CONFIDENTIAL

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
JUN 8	B-727-31H	N908JE	EIDW	JFK		111	JG, GM, SK	1/1	6 9		
8	"	"	JFK	PBI		112	JG, SK	1/	2 3		
12	G-1159B	N909JE	PBI	PBI		1557	GMU FLIGHTS-SEAN RILEY, GREG CAMMARATA	1/1	2 7		
14	B-727-31H	N908JE	PBI	BOS		113	REPOSITION		2 6		
14	"	"	BOS	TIST		114	JG, SK, CINDY LOPEZ, LAURA HAYES		3 7		
16	"	"	TIST	JFK		115	JG, GM, SK, CINDY LOPEZ, LAURA [illegible]	1/	3 8		
19	G-1159B	N909JE	PBI	TEB		1558	REPOSITION PETE RATHGEB	1/1	3 2		
19	"	"	TEB	PBI		1564	JG, GM, SK, CINDY LOPEZ PETE RATHGEB		2 5		
21	"	"	PBI	MYGF		1570	JG, GM, SK, CL, JEAN LUC BRUNEL, VIRGINIA ROBERTS PETE RATHGEB	1/1	1 1		
21	"	"	MYGF	PBI		1571	REPOSITION PETE RATHGEB	0/0	1 2		
23	"	"	PBI	MYGF		1572	REPOSITION PETE RATHGEB	0/0	1 1		
23	"	"	MYGF	TEB		1573	JG, GM, SK, CL, JULIANA [illegible], JEAN LUC BRUNEL/MELISSA [illegible] PETE RATHGEB	1/1	2 9		
23	"	"	TEB	PBI		1574	REPOSITION PETE RATHGEB		2 5		
27	B-727-31H	N908JE	JFK	LFPB		116	JG, GM, SK, AP, FREDERIC FEKKAI, ALEXANDRE FEKKAI, BERENICE [illegible], [illegible] SIMON, DANA LYNN [illegible], DR. HENRY JARECKI, NICHOLAS JARECKI, JULIE-CLAIRE [illegible], [illegible], JEAN LUC BRUNEL, ALLISON WALLACE, AMANDA [illegible]	/1	7 1		
29	"	"	LFPB	LGTH		117	SAME AS 116		1 3		
JUL 10	"	"	LGTH	LFPB		118	JG, JULIE [illegible]	1/1	1 5		
13	"	"	LFPB	LFMN		119	JG	0/0	1 2		
							Page Total	8/7	47 6		
							Amount Forward	0539 6187 6547	8692 5	33	112

I certify that the statements made by me on this form are true.

Pilot's Signature (+) Daniel Perdeles

CONFIDENTIAL DR_000057

Date 19__ 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
JUL 13	B-727-31H	N908JG	LFMN	GMTT		120	JE, GM, SK, AP, CINDY LOPEZ		2 1		
13	"	"	GMTT	GMME		121	JE, GM, SK, CL, AP		7		
13	"	"	GMME	LPAZ		122	JE, GM, SK, AP, CL, PRESIDENT CLINTON DOUG BANDS, MIKE, 8 SECRET SERVICE		2 4		
13	"	"	LPAZ	JFK		123	JE, GM, SK, AP, CL, PRESIDENT BILL CLINTON, DOUG BANDS, MIKE, 8 SECRET SERVICE		5 8		
18	"	"	JFK	PBI		124	JE, SHELLEY LEWIS, 2 FEMALES		2 2		
19	"	"	PBI	JAX		125	KRISTY RODGERS, GREG HOLBERT, ALYSSA HOLBERT – C CHECK		1 0		
AUG 4	G-1159B	N909JE	PBI	MVY		1583	JE, 1 FEMALE		2 8		
4	"	"	MVY	BED		1584	JE, 1 FEMALE		7		
4	"	"	BED	TEB		1585	JE, 1 FEMALE		9		
5	"	"	TEB	SAF		1586	JE, SK, 2 FEMALES	1/1	3 9		
6	C-172XP	N7395P	AEG	AEG			172 CHECK OUT	3/3	9		
6	2OGL3	N474AW	ZORRO	AEG							
15	B-727-31H	N908JE	JAX	JAX		126	C-CHECK FLIGHT TEST — PETE RATHGEB	1/1	9		
16	"	"	JAX	PBI		127	RETURN FROM C-CHECK — PETE RATHGEB		1 1		
17	G1159-B	N909JE	SAF	TEB		1589	JE, GM, SK, CINDY LOPEZ, VIRGINIA ROBERTS, DAN EDWARDS, ALFRED, MARGARITA, NICK SIMMONS, MARION		3 7		
18	"	"	TEB	PBI		1590	JE, VIRGINIA ROBERTS, 1 FEMALE		2 4		
21	B-727-31H	N908JE	PBI	TIST		128	JE, SHELLEY LEWIS		2 5		
25	"	"	TIST	JFK		129	JE, SK	1/1	3 6		
28	"	"	JFK	LFPB		130	JE, SK, CINDY LOPEZ, 1 FEMALE		6 4		
							Page Total	6/6	44 0		5
							Amount Forward	6547 6194	8740 1	3 3	112 6

I certify that the statements made by me on this form are true.

[signature]

CONFIDENTIAL DR_000058

CONFIDENTIAL

Date 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	Points of Departure & Arrival: To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category: Airplane	Aircraft Category: Glider	Aircraft Category: Helicopter
AUG 31	B-727-31H	N908JE	LFPB	EGBB		131	JE, NICOLE JUNKERMANN	1/1	1 0		
SEP 2	"	"	EGBB	LFPB		132	JE, NICOLE JUNKERMANN		1 0		
3	"	"	LFPB	JFK		133	JE, SK, CINDY LOPEZ, JEAN LUC BRUNEL	1/1	7 5		
4	"	"	JFK	PBI		134	JE, 1 FEMALE		2 5		
8	G-1159B	N909JE	PBI	TEB		1592	JE, ANDREA, 2 FEMALES		2 7		
9	G-1159B	"	TEB	BED		1593	JE, SHELLEY LEWIS	1/1	9		
9	"	"	BED	TEB		1594	JE, SHELLEY LEWIS		9		
10	"	"	TEB	TIST		1595	JE, SHELLEY LEWIS, ANDREA, 1 MALE		3 8		
15	"	"	TIST	PBI		1596	JE, SK, DIANE FLEETWOOD	1/1	2 6		
21	B-727-31H	N908JE	JFK	LPAZ		136	PRESIDENT WILLIAM J. CLINTON, SECRET SERVICE, KEVEN SPACEY, CHRIS TUCKER, JE, GM,	/	5 2		
22	"	"	LPAZ	DGAA		137	SK, CL, CHAUNTAE DAVIES, ANDREA MITROVICH, DOUG BAND, DAVID SLANG, JIM KENNEDY,	/1	5 7		
23	"	"	DGAA	DNAA		138	GREG NONNES, RODNEY SLATER, CASEY + LAURY WASSERMAN, RON BURKLE, GAYLE SMITH	9/	1 7		
24	"	"	DNAA	HRYR		139	SAME AS ABOVE LESS RON BURKLE		4 0		
25	"	"	HRYR	FQMA		140	SAME AS ABOVE PLUS IRA MAGAZINER		3 3		
26	"	"	FQMA	FACT		141	SAME AS ABOVE	1/	1 4		
27	"	"	FACT	FAJS		142	SAME AS ABOVE LESS JE, GM, SK, CL, CHAUNTAE DAVIES, ANDREA MITROVICH		2 [illegible]		
28	"	"	FAJS	FACT		143	SAME AS ABOVE LESS GAYLE SMITH, IRA MAGAZINER		2 0		
29	"	"	FACT	DGAA		144	SAME AS ABOVE ADD, JE, GM, SK, CL, CD, AM		6 2		
29	"	"	DGAA	LFPB		145	SAME AS ABOVE	/1	6 5		

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	5/6	62 5		
Amount Forward	6553 / 6200	8784 1	3 3	113
Total to Date	6558 / 6266	8846 6	3 3	113

CONFIDENTIAL DR_000059

GIUFFRE007113
CONFIDENTIAL

Date ~~19~~ 2002	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELI
29 OCT	B-727-31H	N908JE	LFPB	EGGW		146	SAME AS ABOVE LESS JE, SK, CD, LAURA + CASEY WASSERMAN	1/1	9		
1	"	"	EGGW	LFPB		147	GM, NICK + EDWINA SIMMONDS		1 0		
2	"	"	LFPB	JFK		148	JE, GM, SK, CL, ANDREA METROVICH, NAOMI CAMPBELL		8 1		
3	"	"	JFK	PBI		149	JE, SK, ANDREA METROVICH, NICK SIMMONDS, CHGG, IEGMALE		2 4		
6	G-1159B	N909JE	PBI	TEB		1597	JE, SK, ANDREA, RYAN D, 1 FEMALE		2 3		
11	"	"	TEB	PBI		1598	JE, GM, ANDREA, RYAN, STAFF		2 5		
14	"	"	PBI-OFF-PBI			1599	MARK POTTER - PPC ILS SINGLE ENGINE + GO AROUND SE	1/1	8		
15	"	"	PBI	TEB		1600	JE, GM, ANDREA METROVICH, RYAN DEONNE	1/1	2 4		
17	"	"	TEB	TIST		1601	JE, SK, ANDREA METROVICH		3 7		
21	"	"	TIST	PBI		1602	JE, SK, AM, ANNA HANIS, JULIETTE BRYANT	1/1	2 6		
30	"	SIMULATOR	JFK	MIV SIM			STEEP TURNS, STALLS, SLOW FLIGHT, REJECTED TAKEOFF, HOLDING		2 0		
31	"	"	MIV	JFK SIM			SINGLE ENGINE APPROACH, GO AROUND, EMERGENCY DESCENT, ELEC, ELECTRICAL		2 0		
31	"	"	SWF	JFK SIM			ENGINE FIRE, SINGLE ENGINE APPROACH, DOUBLE ENGINE FAILURE, CIRCLING APPROACH	3/3	2 0		
NOV 3	"	N909JE	PBI	TIST		1603	JE, SK, ANDREA METROVICH	1/1	2 3		
6	B-727-200	SIMULATOR	MIA	MIA HOLD SOFN.			DOUBLE ENGINE FAILURE, LOSS OF ALL GENERATORS, EMERGENCY DESCENT, SYS. PLUS		2 0		
6	"	"	MIA	MIA			LOW OIL PRESSURE, HIGH TEMP, ENGINE FIRE, LOSS OF ALL GENERATORS	GROUND TRAINING	2 0		
10	G-1159B	N909JE	TIST	TEB		1604	JE, SK, KELLY MCCARTHY, MA..., STEFANIE BURNS		4 3		
15	"	"	TEB	TIST		1605	JE, GM, RYAN DEONNE, ...CHARLES MILLER, ...		3 6		
15	"	"	TIST	PBI		1606	REPOSITION		2 6		
							Page Total	4/8	4 5		
							Amount Forward	6558 6206	5846	3 3	11 3

I certify that the statements made by me on this form are true.

[signature]

CONFIDENTIAL DR_000060

Date 19__ 2001	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... ASEL/AMEL				
NOV 18	B 727-31H	N908JE	PBI	TIST		156	REPOSITION	1/1	2	4			
18	"	"	TIST	LPAZ		157	JE, GM, SK, ANDREA MITROVITCH, RYAN DIONNE, GD TUTTLE		5	6			
19	"	"	LPAZ	LFPB		158	JE, GM, SK, ANDREA MITROVITCH, RYAN DIONNE, GD TUTTLE	1/1	4	1			
22	"	"	LFPB	EKCH		159	JE, SK, JEAN LUC BRUNEL, ANDREA MITROVITCH		1	8			
22	"	"	EKCH	UUWW		160	JE, GM, SK, ANDREA MITROVITCH		2	5			
24	"	"	UUWW	ULLI		161	JE, GM, SK, ANDREA MITROVITCH	1/1	1	4			
24	"	"	ULLI	EINN		162	JE, GM, SK, ANDREA MITROVITCH		3	6			
24	"	"	EINN	JFK		163	JE, GM, SK, ANDREA MITROVITCH		7	6			
26	"	"	JFK	PBI		164	JE, SK, RYAN DIONNE, MICHAEL LIEFMAN, [illegible] TORN		2	7			
DEC 1	"	"	PBI	JFK		165	JE, GM, SK, ET, MICHAEL LIEFMANN, RYAN DIONNE, TORN, 2 MALES, 4 FEMALES		2	5			
5	"	"	JFK	PBI		166	JE, SK, MICHAEL LIEFMANN, 2 FEMALES		2	3			
9	"	"	PBI	TIST		167	JE, GM, SK, RYAN DIONNE, MICHAEL LIEFMANN, 2 FEMALES	1/1	2	4			
15	"	"	TIST	PBI		168	JE, GM, SK, ET, CHAUNTAE DAVIES, PRINCE ANDREW, TOSCA MARIE, MICHAEL, BRYANT, NICOLE PLAMMER		2	5			
21	G-1159B	N909JE	PBI	ABY		169	JE GARY ROXBURGH	1/1	1	2			
21	"	"	ABY	PBI		170	JE GARY ROXBURGH		1	1			
23	"	"	PBI	TIST			JE, GM, SK, RYAN DIONNE, MICHAEL LIEFMANN, GARY ROXBURGH	1/	2	3			
2002 2 JAN	"	"	TIST	PBI			JE, GM, SK, RYAN DIONNE, NADALE BURHOU, MICHAEL LIEFMANN, STEVEN BOLOT	1/1	2	8			
6	"	"	PBI	TEB			JE, GM, SK, VALSAN		2	9			
9	"	"	TEB	PBI			JE, SK, VALSAN		2	4			
							Page Total	7/6	53	1			
							Amount Forward	6567 / 6214	8896	1	3	3	113
							Total to Date	6574 / 6220	8949	2	3	3	113

I certify that the statements made by me on this form are true.

David Rodgers

Date 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
JAN 11	G-1159B	N908JE	PBI	PBI			TEST FLIGHT - SMOKE IN CABIN			5				
13	B-727-31H	N908JE	PBI	JFK			JE, GM, SK, MAGALI BLACHON, NADIA MICHAEL LIEGMANN, ANDREA MITROVITCH	⓪✓	2	2				
17	"	"	JFK	PBI			JE, GM, SK, MICHAEL LIEGMANN, RYAN DRAWING, JEAN LUC BRUNEL		3	1				
22	"	"	PBI	TIST		171	JE, GM, SK, MAGALI BLACHON, RYAN DRAWING, MICHAEL LIEGMANN	✓	2	2				
25	"	"	TIST	PBI		172	JE, GM, SK, RYAN DRAWING, MICHAEL LIEGMANN		2	8				
26	"	"	PBI	TJAX		173		✓/1		9				
26	G-1159B	N908JE	PBI	TEB		164	JE, SK, MICHAEL LIEGMANN, RYAN DRAWING, MAGALI BLACHON, GARY ROXBURGH	✓	2	5				
31	"	"	TEB	PBI		165	JE, SK, MAGALI BLACHON, MICHAEL LIEGMANN, GARY ROXBURGH		2	6				
FEB 1	B-727-31H	N908JE	TJAX	PBI		174	PETE RATHGEB	✓/1	1	0				
3	"	"	PBI	JFK		175	JE, GM, SK, MICHAEL LIEGMANN, MAGALI BLACHON		2	3				
7	"	"	JFK	PBI		176	JE, SK, MAGALI BLACHON, MICHAEL LIEGMANN	✓/1	2	8				
11	"	"	PBI	TIST		177	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIEN, MICHAEL LIEGMANN		2	5				
12	"	"	TIST	LEGR		178	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIEN, MICHAEL LIEGMANN, [illegible]	/1	7	2				
13	"	"	LEGR	LFPB		179	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIEN, MICHAEL LIEGMANN	✓/1	2	2				
17	"	"	LFPB	CYQX		180	JE, GM, SK, MAGALI BLACHON, PATRICK OCHIEN, JULIETTE BRYANT, DEBORAH AMSELEM, MICHAEL LIEGMANN		5	5				
17	"	"	CYQX	PBI		181	JE, GM, SK, MAGALI BLACHON, MICHAEL LIEGMANN, PATRICK OCHIEN, JULIETTE BRYANT, [illegible]		5	5				
23	"	"	PBI	JFK		182	JE, DEBORAH AMSELEM, JULIETTE BRYANT, MICHAEL LIEGMANN	✓/1	2	6				
25	"	"	JFK	MRY		183	JE, SK, CHAUNTAE DAVIES, DEAN KAMEN + 1		6	3				
							OMITTED LOG BOOK ENTRIES	109/109	11	0				
							Page Total	116/115	65	0				
							Amount Forward	6574 / 6220	8449	2	3	3	113	1
								6690	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	

I certify that the statements made by me on this form are true.

[illegible signature]

CONFIDENTIAL

Date 19__ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOP[TER]	
FEB 28	B-727-31H	N908JE	MRY	ABQ		184	JE, GM, SK, EMMY TAYLER, BRENT, MAGALI BLACHOU		1	8	1	0		
MAR 4	"	"	ABQ	JFK		185	JE, GM, SK, GT, MAGALI BLACHON, JULIETTE BRYANT		3	5				
5	"	"	JFK	PBI		186	JE, MAGALI BLACHON		2	8				
12	B-727-200	[illegible] SERVICE SIMULATOR	MIA	LCL			HOLDING		2	5				
12	"	"	"	"					2	5				
13	"	"	"	"					2	5				
13	"	"	"	"					2	5				
17	G-1159B	N909JE	PBI	TEB			JE, GM, SK, MICHAEL LIFFMANN, MAGALI BLACHON, BRENT		2	4				
19	"	"	TEB	BED		181	JE	1/1	1	0				
19	"	"	BED	TEB			JE		1	1				
20	"	"	TEB	PBI			JE, GM, SK, PRESIDENT ANDRES PASTRANA, MICHAEL LIFFMANN, JEAN LUC BRUNEL		2	8				
21	"	"	PBI	MYNN			JE, GM, SK, PRESIDENT ANDRES PASTRANA, JEAN LUC BRUNEL	1/1	1	0				
23	"	"	MYNN	PBI		1625	JE, GM, SK, JEAN LUC BRUNEL			8				
25	B-727-31H	N908JE	PBI	JFK		187	JE, GM, JEAN LUC BRUNEL, SK, MICHAEL LIFFMANN		2	5				
27	"	"	JFK	TIST		188	JE, SK, CINDY LOPEZ, MAGALI BLACHON, BRENT TINDALL		3	3				
APRIL 2	"	"	TIST	SBGR		189	JE, GM, SK, JEAN LUC BRUNEL, MAGALI BLACHON, NAOMI CAMPBELL		6	4				
5	"	"	SBGR	GVAC		190	JE, GM, SK, JEAN LUC BRUNEL, MAGALI BLACHON		6	2				
6	"	"	GVAC	LFPB		191	JE, GM, SK, JEAN LUC BRUNEL, MAGALI BLACHON	1/1	5	2				
10	"	"	LFPB	CYQX		192	JE, GM, SK, MICHAEL LIFFMANN, EVELYN BOULET, SVETLANA GRIAZNOVE		5	4				
							Page Total	3/3	56	2				
							Amount Forward	6690 6335	9015	2	3	3	113	
							Total to Date	6693 6338	9671	4	3	3	113	

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000063

Date ~~19~~ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
APRIL 10	B-727-31H	N908JE	CYQX	PBI		193	JE, GM, EVELYN BOULET, BLAKE LEHMAN SK, SVETLANA GRIAZNOVA		5	2				
13	G-1159B	N909JE	CMH	TEB		1627	LM, JE, ML, SK, BT [BARRY MASSEY]		1	2				
13	"	"	PBI	CMH		1628	LM, JE, ML, SX, BT [BARRY MASSEY]	1/1	2	2				
14	"	"	TEB	MIV		1626	LM [BARRY MASSEY]			8				
16	"	"	MIV	TEB		1629	[BARRY MASSEY]			8				
17	"	"	TEB	PBI		1630	JE, SX, BT, GM CINDY LOPEZ, ANDREA MITROVICH [BARRY MASSEY]		2	4				
21	"	"	PBI	ADS		1631	JE, SX, BT, CL	1/1	2	8				
21	"	"	ADS	SAF		1632	JE, CL, SX, BT	1/1	1	6				
24	"	"	SAF	SBA		1633	JE, SK, TEALA DAVIES, DIANE		2	0				
24	"	"	SBA	VNY		1634	JE, SK, SHAWNTAE DAVIES, DIANE KELLY BOVINA, EMMY TAYLOR			6				
26	"	"	VNY	TEB		1635	JE, SX	1/	4	8				
MAY 3	"	"	TEB	IAD		1636	ANDREA MITROVITCH, SK, BT			9				
3	"	"	IAD	PBI		1637	JE, AM, SK, BT		2	1				
7	BHT-407	N407BP	BELLSCHOOL	HURST, TX			PEDAL TURNS, QUICK-STOP, NO HYDRAULICS HOVER AUTOS, SLOPES						1	3
7	"	"	"	"			AUTOROTATIONS, 180 AUTOROTATIONS NO HYDRAULICS, HOVER AUTOS						1	2
8	"	"	"	"			AUTOROTATIONS, 180 AUTOROTATIONS, NO HYDRAULICS, AUTO HOVERS						1	5
9	"	N4060Y	"	"			AUTOROTATION 180 AUTOROTATION, NO HYDRAULICS, [illegible] AUTO, [illegible]						1	0
12	"	N491GM	TIST	TIST			LARRY VISOSKI							4
12	B-727-31H	N908JE	TIST	JFK		195	JE, AM, SK, BT, TEALA DAVIES, TATIANA ESPENOSA, GABRIELLA PACIFICO		3	7				
							Page Total	4/3	3	1			5	4
							Amount Forward	6693 6339	9071	4	3	3	113	1
							Total to Date	6697	91[illegible]	[illegible]	[illegible]	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19__ 2003	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	AIRPLANE		GLIDER		HELI	
MAY 20	B-727-31H	N908JE	LIRA	LEMO		198	JE, AM, JEAN LUC BRUNEL, GM, SK [PETE RATHGEB]		2	2				
21	"	"	LEMO	JFK		199	JE, JEAN LUC BRUNEL [PETE RATHGEB]		7	6				
22	"	"	JFK	PBI		200	JE, JEFF PASKOW, TODD MEISTER, BRENT TINDALL	1/1	2	6				
26	G-1159B	N909JE	PBI	TEB		1638	JE, BT, JULIE	✓	2	5				
30	"	"	TEB	TIST		1639	JE, AM, SK, BT		4	0				
JUN 4	"	"	TIST	TEB		1640	JE, AM, SK, BT	1/1	3	8				
4	BHT-407	N491GM	TIST	TIST			JE, AM, SK, VALDSON COTRIN							4
7	G-1159B	N909JE	TIST	PBI		1641	JE, AM, SK, VC		2	5				
11	"	"	PBI	TEB		1642	JE, AM, SK	1/1	2	6				
14	"	"	TEB	CYUL		1643	JE, DOUG BAND, GM		1	2				
14	"	"	CYUL	PBI		1644	JE, DOUG BAND, GM		3	0				
17	B-727-31H	N908JE	PBI	MYNN		201	JE, AM, VC, SK [BOB BRESLIN]			8				
17	"	"	MYNN	JFK		202	JE, AM, GM, SK, VC [BOB BRESLIN]		2	6				
29	"	"	TIST	JFK		206	JE, BT, SUSAN HAMBLIN, JULIE ANDERSON		3	8				
JUL 2	"	"	JFK	PBI		207	JE, BT, FABRIZIO PALUMBO, JLB, SK, SH	✓	2	4				
7	G-1159B	N909JE	PBI	TEB		1645	JE, BT, FP, SK, SH	1/1	2	6				
11	"	"	TEB	PBI		1646	JE, AM, SH	0/D	2	4				
14	"	"	PBI	TEB		1647	JE, AM, BT, SH, MACKLA	1/1	2	5				
14	"	"	TEB	MIV		1648		1/1		8				
							Page Total	8/6	49	9				4
							Amount Forward	6697 / 6341	9102	5	3	3	118	
							Total to Date	6705 / 6347	9152	4	3	3	118	1

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19_ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
JUL 31	B-727-31H	N908JE	JFK	PBI		215	JE, SK, MYLENA, BT, AM [PETER ROTHBERG]	✓	2 5		
AUG 4	"	"	PBI	TIST		216	JE, BT, AM, GM, SK [GARY ROXBURGH]	✓/1	2 4		
4	BH#407	N491GM	LSJ	TIST				0/0			
5	"	"	TIST-LSJ-TIST								
10	B-727-31H	N908JE	TIST	JFK		217	JE, AM, BT, GM, CL, CATHERINE DERBY, MYLENE [GARY ROXBURGH] [illegible]	✓/1	3 8		
10	"	"	JFK	PBI		218	[GARY ROXBURGH]		2 5		
13	G-1159B	N909JE	MIV	TEB		1649	~~[illegible]~~	✓/1	4		
13	"	"	TEB	SAF		1650	JE, AM, BT, GM	✓	3 8		
20	"	"	SAF	ASE		1651	JE, SK, GM		8		
20	"	"	ASE	TEB		1652	JE, GM, SK		3 8		
22	"	"	TEB	PBI		1653	JE, GM, SK, TM	✓	2 3		
31	B-727-31H	N908JE	PBI	JAX		219			9		
31	G-1159B	N909JE	PBI	TEB		1654	JE, BT, GM, SH,		2 5		
31	"	"	TEB	TEB		1655			3		
SEP 16	"	SIMULATOR	LGB	LGB			HOLDING SAGE KEARNY - SEM ENDS [CHRIS GAMBLE]	✓	4 0		
17	"	"	LGB	LGB			HOLDING PETER RUSKE - GOOD [CHRIS GAMBLE]		4 6		
18	"	"	LGB	LGB			[CHRIS GAMBLE]	4/4	4 0		
22	"	N909JE	PBI	TIST		1662	JE, BT, NADIA, SK, SH, TD	✓/1	2 6		
26	B-727-200	SIMULATOR	MIA	MIA			DAVE SAVAGE - INSTRUCTOR		2 0		
							Page Total	12 8	43 1		
							Amount Forward	6765 6347	9152 4	3 3	118 1
							Total to Date	6717	9195 5	3 3	119 7

I certify that the statements made by me on this form are true.

[signature]

CONFIDENTIAL DR_000066

Date 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	
SEP 26	B-727-200	SIMULATOR	MIA	MIA			RCY DARZANT - EXAMINER		2 0			
9/27	C-172	N5279X	LNA	LNA			Darren - Safety Check [illegible] / GD AMATO - EXAMINER	3/3	5			
27	"	"	"	"				2/2	8			
29	G-1159B	N909JE	PBI	TEB		1664	GM		2 4			
30	"	"	TEB	PBI		1665	AM, FRAN, PAULA EPSTEIN		2 6			
OCT 1	"	"	PBI	TEB		1666	JE, AM, SK, JD, VC	✓ 1	2 5			
2	BHT-407	N491GM	PBI	MYNN			LARRY VISOSKI				1	
2	BHEF407	N491GM	MYEF	MBPV			LV				2	
3	"	"	MDPP	MDPC			LV				1	
3	"	"	TIST	TIST			LV				1	
3	G-1159B	N909JE	TEB	PBI		1667	JE, NADIA, SK, JD		2 6			
6	"	"	PBI	BED		1668	JE, NADIA, JD	✓ 1	2 8			
7	"	"	BED	TEB		1669	JE, SH		1 0			
11	"	"	TEB	PBI		1670	JE, BT, GM, JD, CAROLINA	1/1	2 7			
14	"	"	PBI	TEB		1671	JE, BT, GM, SK,		2 5			
16	"	"	TEB	PBI		1672	JE, BT, AM, SK		2 6			
19	"	"	PBI	TEB		1673	JE AM, BT, SK JERRY GOLDSMITH — GARY ROXBURGH	1/1	2 7			
21	"	"	TEB	MTN		1674	JE, SK — GARY ROXBURGH	1/	7			
21	"	"	MTN	TIST		1675	JE, BT, SK, [illegible] — GARY ROXBURGH	1/	3 6			
							Page Total	11/10	32 0		5	
							Amount Forward	6717 / 6355	9195 5	3 3	119 7	
							Total to Date	6728 / 6365	9227 5	3 3	125 0	

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000067

Date ~~19~~ 2003	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
OCT 26	G-1159B	N909JE	TIST	TEB		1676	JE, BT, SK, TO, LC		3	9				
26	"	"	TEB	MIV		1677				9				
27	B-727-31H	N908JE	JAX	JAX		220		✓	1	4				
28	"	"	JAX	PBI		221			1	0				
30	"	"	PBI	JFK		222			2	5				
30	"	"	JFK	LFPB		223	JE, AM	/1	6	9				
NOV 4	"	"	LFPB	EBBR		224	JE, AM, SK			9				
4	"	"	EBBR	ENGM		225	JE, AM, DOUG BAND, GM, 4 SECRET SERVICE PRESIDENT BILL CLINTON, SK		1	8				
4	"	"	ENGM	ESSA		226	JE, AM, GM, SK			9				
5	"	"	ESSA	ENGM		227	JE, AM, GM, SK	1/1		9				
5	"	"	ENGM	UUNT		228	JE, AM, GM, SK, DOUG BAND, 4 SECRET SERVICE PRESIDENT BILL CLINTON	✓	5	3				
6	"	"	UUNT	VHHH		229	JE, AM, GM, SK, DOUG BAND, 4 SECRET SERVICE PRESIDENT BILL CLINTON	/1	6	5				
9	"	"	VHHH	ZUUU		230	JE, AM, GM, SK, DB, IRA MAGAZINER PRESIDENT BILL CLINTON, 4 SECRET SERVICE		2	4				
9	"	"	ZUUU	ZBAA		231	JE, AM, GM, SK, DB, EM, [illegible] TUCKER, JUSTIN [illegible] PRESIDENT CLINTON, [illegible] [illegible], JOE NUSH, SCOTT RUEBER 4SS		2	2				
11	"	"	ZBAA	PANC		232	JE, AM, SK	✓	7	8				
11	"	"	PANC	JFK		233	JE, AM, SK	1/1	6	3				
14	"	"	JFK	PBI		234	JE, BT, SK, ANDREA, LC		2	5				
18	"	"	PBI	JFK		235	JE, BT, SK, LC	✓	2	6				
21	"	"	JFK	CMH		236	JE, SK		1	5				
							Page Total	5/4	58	2				
							Amount Forward	6729 6365	9227	5	3	3	125	6
							Total to Date	6734 6369	9285	7	3	3	125	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000068

Date 2003	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane		Glider		Helicopter	
NOV 21	B-727-31H	N908JE	CMH	TIST		237	JE, SK		3	7				
22	"	"	TIST	PBI		238	JE, SK, NICK CAMBRO, CHRIS CAMBRO, TOM PAYCETTO	✓	2	7				
23	"	"	PBI	JFK		239	JE, SK		2	4				
25	"	"	JFK	PBI		240	JE, BT, EVA ANDERSSON, GM, AM, [illegible] GLEN [illegible], JORDAN [illegible], [illegible], MORGAN		2	5				
DEC 7	G-1159B	N909JE	MIV	JFK		1678	MICHAEL DUBERLY	✓		8				
7	"	"	JFK	CMH		1679	JE, SK, NADIA MICHAEL DUBERLY	✓	1	5				
7	"	"	CMH	PBI		1680	JE, SK, NADIA MICHAEL DUBERLY	✓	2	3				
9	"	"	PBI	TIST		1681	JE, SK, TD GARY ROXBURGH	✓	2	4				
15	"	"	TIST	TEB		1682	JE, AM, TD, KIMBERLY BURNS		4	5				
19	"	"	TEB	TIST		1683	JE, GM, SK [illegible]	✓	3	9				
24	"	"	TIST	PBI		1684	JE, GM, BT STEVE LESKIE	✓	2	7				
26	"	"	PBI	TIST		1685	JE, BT, GM GARY KENNEY	✓	2	3				
2004 JAN 2	"	"	TIST	PBI		1686	JE, BT, GM, JEAN LUC BRUNEL, NM MANUELLA STOCKTER LV	✓	2	7				
3	"	"	PBI	ISM		1687	JE, CELINA DUBIN, EVA ANDERSSON, GM, JORDAN DUBIN, BRUCE, NADIA MARCINKOVA LV			7				
3	"	"	ISM	PBI		1688	JE, CD, JD, GM, EA, NM BRUCE LV			7				
5	"	"	PBI	TEB		1689	JE, BT, JLB, SK, LV	✓	2	5				
8	"	"	TEB	PBI		1690	JE, BT, JLB, SK LV		2	6				
12	B-727-31H	N908JE	PBI	JFK		241	JE, BT, NM, TESLA DAVIES, SK LV LM		2	4				
15	"	"	JFK	PBI		242	JE, SK, TD, NM LV LM		2	5				
							Page Total	10/6	45	8				
							Amount Forward	6734 6369	9285	7	3	3	125	0
							Total to Date	6744	9331	5	3	3	125	0

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date ~~10~~ 2004	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter
JAN 20	B-727-31H	N908JE	PBI	JFK		243	JE, BT, NM, SK, TD	LV LM		2 6		
23	"	"	JFK	PBI		244	JE, BT, CHAUNTAE DAVIES, TD, NM, ANDREA MITROVICH	LV LM		2 6		
26	G-1159B	N909JE	PBI	TEB		1691	JE, BT, NM, TD	LV	✓	2 4		
28	"	"	TEB	TIST		1692	JE, BT, NM, SK, TD	LV		3 6		
FEB 2	"	"	TIST	TEB		1693	JE, BT, JLB, NM, TD, SK, ALENE WEBER	LV	✓	4 1		
5	"	"	TEB	BED		1694		LV		8		
5	"	"	BED	TEB		1695	ALAN DERSHOWITZ	LV		1 1		
5	"	"	TEB	PBI		1696	JE, AD, SK	LV		2 6		
9	B-727-31H	N908JE	PBI	JFK		245	JE, BT, SK,	GR LM	✓	2 5		
12	"	"	JFK	LFPB		246	JE, GM, JLB, ALENE WEBER, NINA KEITA	LV LM		7 0		
17	"	"	LFPB	BGR		247	JE, GM, JLB, NM, TD, AW	LV LM		6 9		
17	"	"	BGR	JFK		248	JE, GM, JLB, TD, NM, AW	LV LM		1 5		
19	"	"	JFK	PBI		249	JE, BT, NM, SK, TD,	LV LM		2 4		
22	"	"	PBI	JFK		250	JE, BT, NM, TD, AW	LV LM	✓	3 0		
24	"	"	JFK	MRY		251	JE, SK, TD, NM, FOREST SAWYER	LV LM		5 9		
27	"	"	MRY	VNY		252	JE, NM, SK, TD	LV LM	✓ 1	8		
29	"	"	VNY	ABQ		253	JE, NM, SK, TD	LV LM		1 6		
MAR 1	"	"	ABQ	JFK		254	JE, GM, NM, SK, TD	LV LM	✓	3 4		
3	"	"	JFK	PBI		255	JE, NM, TD, VALDSON COTRIN	LV LM		2 5		
							Page Total		6 / 1	57 3		
							Amount Forward		6744 6375	9331 5	3 3	125 0
							Total to Date		6750	9388 8	3 3	125 0

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000070

Date 19 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELICOPTER	
MAR 7	G-1159B	N909JE	PBI	TEB		1697	JE, NM, TD	GARY BLACKWELL	✓	2	8				
8	"	"	TEB	BGD		1698	JE, TD	GARY BLACKWELL	✓		8				
9	"	"	BGD	TEB		1699	JE, TD	GARY BLACKWELL	✓	1	1				
11	"	"	TEB	PBI		1700	JE, TD, SK, NM VALDSON COTRIN	GB		2	6				
13	"	"	PBI	TIST		1701	JE, TD, SK, VC, NM	STEVE LESTER	✓	2	3				
17	B-727-200	SIMULATOR	MIA	MIA			LARRY-INSTRUCTOR	GARY ROXBURGH		2	0				
17	"	"	MIA	MIA			HOLDING LARRY-INSTRUCTOR	GR		2	0				
17	"	"	MIA	MIA			FE CHECK RIDE HANK COUGAR	GR		2	0				
18	"	"	MIA	MIA			REY BARZANA	GR		3	0				
18	"	"	MIA	MIA			REY BARZANA B-727 CAPT CHECK RIDE	GR		3	0				
19	G-1159B	N909JE	TIST	PBI		1702	JE, SK, TD, VC	LV		2	6				
31	B-727-31H	N908JE	PBI	JFK		256	JE, NM, TD,	LV LM	✓	2	3				
APR 2	"	"	JFK	PBI		257	JE, JLB, NM, TD	LV LM		2	5				
6	G-1159B	N909JE	PBI	TIST		1705	JE, BT, NM, SK, TD	LV	✓	2	3				
11	B-727-31H	N908JE	PBI	JFK		258	JE, BT, CD, EA, JD, GM, NM, TD GLEN DUBIN, EVA DUBIN, 2 NANNIES	LV LM	✓	2	4				
15	"	"	JFK	BGD		259	JE, SK, LARRY SUMMERS	LV LM			9				
16	"	"	BGD	PBI		260	JE, SK	LV LM	1/0	2	6				
19	"	"	PBI	JFK		261	JE, SK, JENNIFER	LV LM		2	6				
22	"	"	JFK	PBI		262	JE, BT, MARK EPSTEIN, NM, TD, TAMI, GM	LV LM	✓	2	5				
							Page Total		9/4	42	3				
							Amount Forward		6750 6376	9358	8		33	125	6
							Total to Date		6759 6380	9431	1		33	125	6

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
APR 27	B-727-31H	N908JE	PBI	JFK		263	JE, BT, NM, TD	LV LM		2 2		
MAY 1	"	"	JFK	PBI		264	JE, NM SK	LV LM		2 6		
4	"	"	PBI	JFK		265	JE, NM, SK	LV LM		2 4		
5	"	"	JFK	LFPB		266	JE, GM, NM, SK ARIANE [illegible]	LV LM	/1	6 9		
8	"	"	LFPB	EGGW		267	JE, GM, NM, SK	LV LM		9		
10	"	"	EGGW	LKPR		268	JE, GM, NM, SK	LV LM	√1	1 8		
12	"	"	LKPR	LFPB		269	JE, GM, JLB, NM	LV LM		1 4		
14	"	"	LFPB	CYQX		270	JE, NM, SK,	LV LM	√1	5 8		
14	"	"	CYQX	PBI		271	JE, NM, SK	LV LM	√1	4 2		
15	G-1159B	N909JE	PBI	PBI		1707	RON	LV LM	√1	7		
17	"	"	PBI	TEB		1708	JE, BT, NM, TD	LV		3 2		
21	"	"	TEB	PBI		1709	JE, BT, NM, TD	LV	√	2 4		
24	"	"	PBI	TIST		1710	JE, NM, SK, TD	LV		2 6		
31	"	"	TIST	TEB		1711	JE, NM, SK, TD, MANUELA STRETTER	LV	√1	4 2		
JUN 4	"	"	TEB	HVN		1712	BT	LV		5		
4	"	"	HVN	PBI		1713	JE, BT, MS, NM, TD	LV		2 7		
7	"	"	PBI	TEB		1714	JE, BT, MS, NM, TD	LV	|||	2 5		
9	"	"	TEB	BED		1715	JE, MS, SK	LV		9		
9	"	"	BED	TEB		1716	JE, MS, SK	LV		8		

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Airplane	Glider	Helicopter
Page Total	7/7	48 7		
Amount Forward	6759 / 6390	9431 1	3 3	125 0
Total to Date	6766 / 6397	9479 8	3 3	125 0

CONFIDENTIAL DR_000072

Date ~~19~~ 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Manouvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
JUN 11	G-1159B	N909JE	TEB	MDW		1717	JE, SK	LV	\/1	1 9		
12	"	"	MDW	PBI		1718	JE, SK	LV		2 7		
13	B-727-31H	N908JE	PBI	JFK		272	JE, SK, A.D. GOSMAN,	LV LM		2 5		
15	"	"	JFK	TIST		273	JE, BT, MS, SK, TD	LV LM	\/1	3 5		
20	"	"	TIST	PBI		274	JE, BT, JENNIFER KALIN, MS, NM, NATALYA MALYSHOV	GR LM	\/1	2 5		
21	G-1159B	N909JE	PBI	TEB		1719	JE, BT, MS, NM	LV		2 6		
23	"	"	TEB	SAF		1720	JE, NM, SK	LV	\/1	4 4		
JUL 2	"	"	SAF	LAS		1721	JE, MS, NM, SK, SEMOENE, FLORES	GR	\/1	1 6		
2	"	"	LAS	SAF		1722	JE, MS, NM, SK, SEMOENE, FLORES	GR		1 3		
4	"	"	SAF	ASE		1723	JE, MS, NM, SK, SEMOINE	GR	\/1	9		
4	"	"	ASE	PBI		1724	JE, MS, NM, SK, SEMOINE	GR	\/0	3 8		
11	"	"	PBI	TEB		1725	JE, ANDREA MITROVICH, BT, NM, SK	LV		2 7		
15	"	"	TEB	PBI		1726	JE, BT, JLB, NM, SK, JK, 2 SUTZIO, (ZIE FRIDE)	LV	\/	2 6		
19	B-727-31H	N908JE	PBI	TIST		275	JE, BT, SK, NM, JK, STEFANIE [illegible],	LV LM		2 6		
22	"	"	TIST	PBI		276	JE, BT, NM, SK, JK	STEVE MALLER LM		2 6		
25	"	"	PBI	JFK		277	JK, NM, BT	SM LM	\/1	2 4		
29	"	"	JFK	LFPB		278	JE, MS, NM, SK	LV LM		6 6		
AUG 3	"	"	LFPB	LEPA		279	JE, MS, NM, SK, TD	LV LM	\/1	1 7		
3	"	"	LEPA	LPAZ		280	JE, MS, NM, SK, TD	LV LM	\/1	3 6		
								Page Total	11/9	25		
								Amount Forward	6166 6387	94798		33 125
								Total to Date	6177 6246	95323		33 125

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000073

CONFIDENTIAL DR_000074

Date ~~19~~ 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER
AUG 3	B-727-31H	N908JE	LPAZ	TIST		281	JE, MS, NM, SK, TD, ~~JE~~	LV LM	1/	5.6		
6	"	"	TIST	PBI		282	JE, SK, TD, ~~[illegible]~~ JENNIFER KALLIE, NATALYA MALYSHOV	GR LM		2.4		
10	"	"	PBI	JFK		283	JE, JOJO, LYN FONTANELLA, SK, NATALYA MALYSHOV, DAVID	LV LM		2.4		
13	"	"	JFK	ABQ		284	JE, MS, N MARCINKOVA, FLORA, DAVID, JK	LV LM	1/1	4.7		
18	"	"	ABQ	VNY		285	JE, MS, NM, JK	LV LM		1.7		
19	"	"	VNY	PBI		286	JE, MS, NM, JK	FRANK GAMBLE LM		4.7		
24	"	"	PBI	SEGU		287	JE, GM, NM, SK, TD	LV LM		4.1		
25	"	"	SEGU	PBI		288	JE, GM, NM, SK, TD	LV LM	1/1	4.3		
SEP	"	"	PBI	TIST		289	JE, NM, SK, TD	LV LM		3.2		
2	G-1159B	N909JE	PBI	TEB		1127	KRISTY RODGERS PATSY RODGERS	LV		2.5		
5	B-727-31H	N908JE	TIST	JFK		290	JE, NM, TD, JK, NATALYA MALYSHOV	RALPH PASCUCCI LV	1/	3.8		
16	"	"	JFK	PBI		291	JE, NM, SK, JK, DAVID MULLEN	LV LM		2.7		
20	BHT-407	N407BS 53555	BELLSCHOOL OTC	HURST, TX			HOVER, HOVER AUTOS, OBSTACLE TAKE-OFF STRAIGHT-IN AUTOS, 180° AUTO			~~1.7~~		1
21	BHT-407	N407BP 53555	BELL SCHOOL OTC	HURST, TX			[signature] 173849 CFI EXP 10/06			~~1.0~~		1
OCT 5	B-727-31H	N908JE	PBI	JFK		296	JE, NM, SK	LV LM	1/1	2.4		
6	"	"	JFK	PBI		297	JE, EVA ANDERSSON, NM, 2 NANNIES, CELINA + MYA DUBIN, JORDAN, SK	LV LM		2.3		
10	"	"	PBI	JFK		298	JE, EVA ANDERSSON, 2 NANNIES, SK, GM, CELINA + JORDAN + MYA DUBIN	LV LM	1/	2.5		
12	"	"	JFK	TIST		299	JE, JK, NM, SK	LV LM		3.3		
13	G-1159B	N909JE	TEB	PBI		1128	GM	LV LM		2.5		
							Page Total		6/3	55.1		2
							Amount Forward		6777 6396	9532.3	3.3	125
							Total to Date		6783 6399	9587.4	3.3	127

I certify that the statements made by me on this form are true.

David Rodgers

Date 19— 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE		GLIDER		HELI
OCT 16	B-727-31H	N908JE	TIST	PBI		300	JE, JK, NM, SK LAURA & NORLEW, LESA ANDREW	LV LM	1/	2	4			
17	"	"	PBI	JFK		301	JE, GM, JK, NM LAURA & LESA ANDREW	LV LM		2	5			
20	"	"	JFK	LFPB		302	JE, JK, NM, SK, DAVID MULLIN	LV LM	/1	6	8			
25	"	"	LFPB	JFK		303	JE, NM, JK, SK, DM	LV LM		7	6			
25	"	"	JFK	JAX		304		LV LM		2	1			
29	G-1159B	N909JE	PBI	TEB		1729		LV		2	6			
29	"	"	TEB	PBI		1730	JE, JK, NM, NATALIE	LV		2	3			
NOV 1	"	"	PBI	TIST		1731	JE, NM	LV	1/1	2	6			
1	BHT-407	N491GM	TIST	LSJ				LV						
1	"	"	LSJ	TIST				LV						
2	G-1159B	N909JE	TIST	TEB		1732	JE, NM	LV		4	0			
7	G-1159B	SIMULATOR	DFW	DFW			STEEP TURNS, STALLS, JET UPSET, ICING SE. ILS, ABORT, ENGINE FIRE			4	6			
8	"	"	"	"			HOLDING, HIGH ALTITUDE AIRPORTS, EMERGENCY DESCENT, IEO NORMAN RUMBLE			4	0			
9	"	N909JE	PBI	TEB		1734	JE, SK	PIA TRUSELL	/	2	7			
10	"	"	TEB	PBI		1735	JE, SK	PEA PRUSELL		2	4			
14	"	"	PBI	ABY		1736	JE, NM, SK, TD, VC	LV		1	3			
14	"	"	ABY	TEB		1737	JE, NM, SK, TD, VC	LV		2	1			
16	"	"	TEB	BED		1738	JE, ANDREA	LV	1/1		8			
16	"	"	BED	TEB		1739	JE, ANDREA	LV			8			
							Page Total		4/3	51	0			
							Amount Forward		6783 6399	9587	4	3	3	127
							Total to Date		6787 6402	9638	4	3	3	128

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000075

Date 2004	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
NOV 18	G-1159B	N909JE	TEB	PBI		1740	JE, JK, NM, SK, DM, ANDREA	LV		2 3		
20	B-727-31H	N908JE	JAX	(NC MTRS) JAX		3-5		LV LM	V/1	2 6		
20	"	"	JAX	PBI		3-6		LV LM	V	1 0		
23	"	"	PBI	TIST		3-7	JE, NM, SK, DM, SUSAN HAMBLEN	LV LM		2 3		
26	G-1159B	N909JE	PBI	TIST		1741	GM, JK	LV	V/1	2 4		
28 Dec	B-727-31H	N908JE	TIST	JFK		3-8	JE, GM, JK, NM, SK, DM, SH	LV LM	V	4 0		
3	"	"	JFK	PBI		3-9	JE, NM, SK, SH, ADRIANNA	LV LM		2 8		
14	B-727-200	SIMULATOR	MIA	MIA			HANK COLLER - INSTRUCTOR			1 8		
15	"	"	"	"			HANK COLLER - INSTRUCTOR	WILLIAM JOSU		1 7		
15	"	"	"	"			HANK COLLER / REY BAZANA - INSTRUCTOR	WILLIAM		1 7		
21	G-1159B	N909JE	PBI	TIST		1745	JE, SK, NM, GM	STEVE LESTER	V/1	2 3		
29	"	"	TIST	TNCM		1746	JE, NM, SK	LV		7		
29	"	"	TNCM	TIST		1747	JE, NM, SK	LV		7		
30	BHT-407	N491GM	TIST-LSJ	-TISX				LV				
30	"	"	LSJ	TIST				LV				
2005 JAN 1	G-1159B	N909JE	TIST	TQPF		1748	JE, JLB, SK, DM, NM, ~~NADEA BJORLEN~~, ZINTA BROWN	LV	V/1	6		
1	"	"	TQPF	PBI		1749	JE, DM, JLB, NM, SK, ZB	LV	V/1	3 2		
3	"	"	PBI	TEB		1750	JE, DM, GM, NM, SK	LV		2 7		
6	"	"	TEB	PBI		1751	JE, DANA	LV		2 7		
							Page Total		7/5	35 5		1
							Amount Forward		6787 1102	9639 4	3 3	12.6
							Total to Date		6794 [illegible]	9613 9	3 3	12.9

I certify that the statements made by me on this form are true.

(signature) David Rodgers

CONFIDENTIAL DR_000076

GIUFFRE007130
CONFIDENTIAL

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	[illegible]
JAN 8	G-1159B	N909JE	PBI	RSW		1752	LV		6		
8	"	"	RSW	PBI		1753	LV	1/1	6		
11	B-727-31H	N908JE	PBI	TIST		310	JE, NM, SK LV LM		2 5		
14	"	"	TIST	PBI		311	JG, NM, SK LV LM		2 8		
27	"	"	PBI	TIST		315	JE, NM, ANDREA LV LM		2 3		
31	"	"	TIST	JFK		316	JE, NM, SK, DB, ANDREA MUNCENSICA LV LM		3 8		
FEB 3	"	"	JFK	CMH		317	JE, DM, JLB, NM, SK, DANA BURNS LV LM	1/1	1 4		
3	"	"	CMH	PBI		318	JG, DM, JLB, NM, SK LV LM		2 2		
7	"	"	PBI	JFK		319	JG, DM, NM, SK LV LM		2 5		
10	G-1159B	N909JE	PBI	PBI		1754	NEEL, BEGGEN PETE RATHGEB	1/1	1 1		
19	"	"	PBI	TIST		1755	COLLEEN GR	1/1	2 4		
19	"	"	TIST	PBI		1756	GM, EVA ANDERSSON LEGENA + MYA DUBEN, CRESENCIA VALDEZ GR	1/	2 7		
24	B-727-31H	N908JE	PBI	PBI		324	BILL HAMMOND LV LM		5		
MAR	"	"	PBI	JFK		325	JE, NM, ADRIANA MUCINSKA DB, DM LV LM	1/1	2 4		
6	B-727-200	SIMULATOR	MIA	MIA			HOLDING, STEEP TURNS, STALLS, RTO, V1 CUT, 2EO, 1EO, RICK MONNAR - INST.		2 0		
7	"	"	MIA	MIA			RTO, STEEP TURNS, STALLS, 1EO, 2EO, REV PRESSURE CIRCLING APPROACH, EVACUATION VRIDE BILL MURPHY		2 5		
8	G-1159B	N909JE	PBI	SAN		1759	GM	1/	5 6		
13	"	"	SAN	MDW		1760	GM BM	1/	3 5		
14	"	"	MDW	TEB		1761	GM BM	1/1	1 7		
							Page Total	9/6	43 1		
							Amount Forward	6794 / 6407	9673 9	3 3	[illegible]
							Total to Date	6803 / 6413	9717 0	3 3	[illegible]

I certify that the statements made by me on this form are true.

David Rodgers

CONFIDENTIAL DR_000077

GIUFFRE007131
CONFIDENTIAL

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	C-[illegible]	HELI[illegible]
MAR 24	B-727-31H	N908JE	JFK	TIST		333	JE, NM, SK, DB, DM LV BH		3 6		
24	"	"	TIST	JFK		334	JE, NM, SK, DM, DB BH LM	1/1	3 1		
31	"	"	JFK	PBI		335	JE, GM, DB LV LM		2 8		
APR 1	G-1159B	N909JE	SAV	PBI		1766	LV LM		1 2		
5	"	"	PBI	PDK		1767	GM LV	1/1	1 6		
5	"	"	PDK	TEB		1768	GM LV	1/	1 8		
6	B-727-31H	N908JE	PBI	JFK		336	JE, DB, DM, SK ADRIANA MUCINSKA LV LM	1/1	2 5		
24	G-1159B	N909JE	PBI	TIST		1773	JE, MS, VC, TATIANNA ADRIANA MUCINSKA LV		2 3		
MAY 4	"	"	TIST	TEB		1774	JE, AM, NM, VC BH	1/1	4 1		
6	"	"	TEB	PBI		1775	JE, AM, DM, NM, SK LM LV		2 5		
10	"	"	PBI	TEB		1776	JE, DB, DM, SK LV	1/1	2 6		
12	B-727-31H	N908JE	JFK	TIST		339	JE, AM, DM, NM, DB BH LM	1/	3 1		
16	"	"	TIST	JFK		340	JE, NM, DB, DM, AM BH LV		3 3		
19	G-1159B	N909JE	TEB	PBI		1777	JE, AM, SK BH	1/	2 5		
24	"	"	PBI	TEB		1778	JE, AM, SK LV		2 6		
JUN 1	"	"	PBI	TEB		17[illegible]	JE, AM, NM LV	1/1	2 5		
15	B-727-200	SIMULATOR	MIA	MIA			RICK MONNAR - INSTRUCTOR		2 0		
15	"	"	"	"			REY BARZANA - V RIDE		2 0		
JUN 27	G-1159B	N909JE	TEB	PBI		1786	JE, DB, SK LV	1/	2 4		
							Page Total	10/6	50 4		
							Amount Forward	6903 6413	9717 0	3 3	12[illegible]
							Total to Date	6913 [illegible]	9767 4	3 3	12[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELI
JUL 5	G-1159B	N909JE	PBI	TEB		1787	JE, AM, SK	LV		2.5		
10	"	"	TIST	TEB		1791	JE, AM, DB, NM	BH	1/1	4.0		
18	"	"	PBI	TEB		1792	JE, DB, SK	LV	1/1	2.6		
20	"	"	TEB	BKL		1793	GM, IAN	JIM DOWD	1/1	1.2		
20	"	"	BKL	TEB		1794	GM, IAN	JIM DOWD	1/1	1.2		
22	"	"	TEB	PBI		1795	JE, SK, DB, TATIANNA	BH		2.5		
25	"	"	PBI	TEB		1796	JE, SK, DB, TATIANNA	BH	1/1	2.6		
29	"	"	TEB	TIST		1797	JE, NM, JK	BH	1/1	3.9		
AUG 1	"	"	TIST	TEB		1798	JE, JK, NM	BH	1/1	3.8		
2	"	"	TEB	SAF		1799	JE, SK, DB, AM, ALEX, NATALGG, SEMOVA, TATIANNA	BH	1/1	3.6		
18	"	"	TEB	PBI		1804	JE, AM, MR + MRS MUCINSKA, NM, MS MUCINSKA	LV	1/1	2.3		
22	"	"	PBI	TEB		1806	JE, NM	LV		2.5		
24	"	"	TEB	FDK		1807	JE, DB	LV	1/1	.8		
24	"	"	FDK	TEB		1808	JE, DB	LV	1/1	.8		
26	"	"	TEB	MVY		1809	JE, DB, SK, DM	LV		.8		
26	"	"	MVY	TIST		1810	JE, DB, DM, SK	LV		3.3		
27	"	"	TIST	PBI		1811		LV	1/1	2.6		
SEP 5	"	"	PBI	TEB		1814	JE, DB, GM, AM	BH		2.4		
8	B-727-200	SIMULATOR	MIA	MIA			HAL LEXO-INSTRUCTOR	LM		2.0		
							Page Total		12/11	45.4		
							Amount Forward		6813/6614	9767.4	3.3	12.1
							Total to Date		6825	[illegible]	[illegible]	[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000079

Date 2005	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane	Glider	Heli...
SEP 9	B-727-200	SIMULATOR	MIA	MIA			LM ✓ RECC, BCY BARZANNA ✓ RECC EXAMINER, HAL LEXO			2 0		
11	G-1159B	N909JE	PBI	TIST		1816	JE, AM, NM	LV		2 6		
13	"	"	TIST	TEB		1817	JE, AM, NM	BH	V/1	3 8		
14	"	"	TEB	BED		1818	JE, AM, SK	BH		8		
14	"	"	BGD	HPN		1819	JE, AM, SK, LARRY SUMMERS	BH		8		
20	"	"	PBI	TIST		1821	JE, DB, SK, JIM	LV	V/	2 5		
24	"	"	TIST	TEB		1822	JE, ALEX RESNIK, SANDY BERGER, DB, SK, TATIANA SEMANOVA	LV		3 7		
25	"	"	TEB	CMH		1823	JE, NM, SK, PAUL HALODA	LV	V/1	1 4		
25	"	"	CMH	TEB		1824	JE, NM, SK	LV	V/1	1 4		
27	"	"	TEB	BED		1825	JE, AM, NM	LV		8		
27	"	"	BED	TEB		1826	JE, AM, NM	LV		1 0		
OCT 9	B-727-31H	N908JE	LCQ	LCQ		343	~~JE, AM, NM~~ GEORGE GEYER	LM	V/	1 7		
22	"	"	TIST	JFK		348	JE, AM, NM	BH LM	0/D	3 7		
NOV 2	G-1159B	N909JE	TEB	BED		1834	JE, GM, SK, TATIANNA, DB	LV		8		
2	"	"	BED	OQU		1835	GM	LV		5		
2	"	"	OQU	BED		1836	GM	LV		5		
2	"	"	BED	TEB		1837	JE, DB, GM, SK, TATIANNA	LV		9		
3	B-727-31H	N908JE	JFK	TIST		351	JE, NM, SK	LV LM		4 4		
8	"	"	TIST	JFK		352	JE, ANDREA MITROVICH, NM, SK, CRISTALLE WASCHE, KAL ZANOVICH, CHARLENE METS	BH LM		3 9		
							Page Total		5/4	37 2		
							Amount Forward		6825 6430	9812 8	3 3	12.. 4
							Total to Date		6830 6434	9850 0	3 3	1.. 4

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000080

Date 19 2005	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane	Glider	Helicopter
Nov 12	G-1159B	N909JE	TEB	TIST		1838	JE, ADRIAN MUCINSKA, TATIANA KOVYLINA(?), NM, VC, MARK TAFOYA	BH		3 4		
16	"	"	TIST	TEB		1839	JE, AM MARC [illegible], NM	LV		3 8		
17	"	"	TEB	BED		1840	JE, ~~AM~~ AM	LV	1/1	8		
17	"	"	BED	CYUL		1841	ALAN DERSHOWITZ	LV	1/1	9		
17	"	"	CYUL	BED		1842	ALAN DERSHOWITZ	LV		8		
17	"	"	BED	TEB		1843	JE, AM, AD, TATIANNA	LV		9		
19	B-727-31H	N908JE	JFK	TIST		353	JE, NM, SK	LV LM		3 5		
20	"	"	TIST	TAPA		354	JE, NM, SK, TATIANA KOVYLINA	LV LM	1/1	9		
20	"	"	TAPA	TIST		355	JE, ~~[illegible]~~, NM, SK TATIANA KOVYLINA	LV LM	1/1	8		
28	"	"	TIST	JFK		356	JE, AM, EZ, MARK TAFOYA, TATIANA SCHAMAVA, JUAN MOLYNEUX	BH LM		3 9		
30	G-1159B	N909JE	TEB	BED		1844	JE, AM, NM	BH		8		
30	"	"	BED	TEB		1845	JE, AM, NM	BH		9		
DEC 10	"	SIMULATOR	DFW	DFW			HOLDING, STEEP TURNS, STALLS, JETUPSET, NO FLAP LANDING, NUTCRACKER FAILURE			2 5		
11	"	"	"	"			RTO, EMERGENCY DESCENT, V1 CUT, W EMD SHEAR, NO FLAP LANDING		2/2	2 0		
21	"	N909JE	TEB	BED		1852	GM	LV		9		
21	"	"	BED	TIST		1853	GM, LARRY + LISA SUMMERS	LV		3 8		
2006 JAN 15	"	"	TIST	BED		1854	JE, NM	LV	1/	3 8		
16	"	"	BED	TEB		1855	JE, NM	LV		1 0		
19	"	"	TEB	SAF		1856	JE, GM, IZ, NM, SK	LV		4 5		
							Page Total		7/6	39 8		
							Amount Forward		[illegible]30 6434	9850 0	33	129 4
							Total to Date		6837	9[illegible] 8	33	129 4

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000081

Instructions

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival: From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL
JAN 23	G-1159B	N909JE	SAF	TEB		1857	JE, IGOR ZINOVIEV, SARAH KELLEN, NADIA MARCINKOVA, JOANNA		3 3				3
26	"	"	TEB	TIST		1858	JE, IZ, NM, JOANNA	Q/Q	3 4				3
31	"	"	TIST	BED		1859	JE, ADRIANA MUCINSKA, NM		3 8				3
31	"	"	BED	TEB		1860	JE, AM, NM		1 0				1
FEB 15	"	"	TIST	BOS		1863	GARY FENNELL		4 0				4
15	"	"	BOS	PBI		1864	ALAN DERSHOWITZ, GARY FENNELL, MITCH	1/1	3 0				3
16	"	"	PBI	TEB		1865	ALAN DERSHOWITZ GARY FENNELL MITCH	1/1	2 4				2
21	"	"	TIST	TEB		1867	JE, IZ, NM BH	1/1	4 1				4
22	"	"	TEB	BED		1868	JE, NM BH		9				
22	"	"	BED	TEB		1869	JE, NM BH		9				
24	"	"	TEB	TIST		1870	JE, IZ, NM, SK, LANCE CALLAWAY BH	Λ	3 4				[illegible]
26	"	"	TIST	TEB		1871	JE, IZ, NM, SK, LC		4 1				[illegible]
MAR 12	"	"	TIST	TEB		1873	JE, IZ, SK, LC, TATYANA SIMONOVA, STEPHANIE STIDWELL, NINA MCLOUGHLIN BH	1/	4 2				[illegible]
13	"	"	TEB	BED		1874	JE, NM, ST BH		8				
14	"	"	BED	TEB		1875	JE, NM, ST		1 0				[illegible]
16	"	"	TEB	TIST		1876	JE, IZ, SK, LC, DAVID BURNS BH	1/1	3 4				[illegible]
23	B-727-200	SIMULATOR	MIA	MIA			HAL LAXO - SIM INSTRUCTOR, HOLDEN WILLIAM LEONARDO - GROUND INSTRUCTOR		2 0				[illegible]
23	"	"	"	"			B-727 CHECK RIDE RAY BARZANA		2 5				[illegible]
24	"	"	"	"			FLIGHT ENGINEER - PC RAY BARZANA, WILLIAM HAL		2 0				[illegible]
							Page Total	5/5	50 2				
							Amount Forward	6837 6440	9889 8	3 3	129 4	2176	8 77
							Total to Date	6842 6445	9940 0	3 3	129 4	2176	8 7

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helo Lndgs
MAR 28	G-1159B	N909JE	TIST	TEB		831	JE, DB, LC, TS	LV	1/1	4 0				4 0	
APR 3	"	"	TEB	TIST			JE, IZ, LC, NM, SK	LV		3 6				3 6	
17	B-727-31H	N908JE	TIST	JFK		366	JE, DB, GM, IZ, LC, SK	LV LM		3 9				3 9	
25	"	"	JFK	BED		367	JE, IZ, LC, NM, SK	BH LM	1/1	9				9	
25	"	"	BED	TIST		368	JE, IZ, LC, NM, SK	BH LM	1/	3 4				3 4	
MAY 1	BHT-407	N407BP	AFW	AFW			AIRMS. HOLDER OF PILOT CERTIFICATE #					1 4			
2	"	"	AFW	AFW			HAS SATISFACTORILY COMPLETED THE FLIGHT REVIEW REQUIRED BY FAR 61.56 ON 5/2/06 BY [signature]					1 4			
2	"	FTD	AFW	AFW			CERTIFICATE NO. 3077866 CFI EXPIRES 11/31/07 MIKE TERRY - INSTRUCTOR					5			
20	B-727-31H	N908JE	JFK	LFPB		372	JE, DB, GM, NM, SK	LV LM	0/1	6 9				6 9	
26	"	"	LFPB	BGR		373	JE, DB, SK	LV LM		7 4				7 4	
26	"	"	BGR	JFK		374	JE, DB, SK	LV LM		1 3				1 3	
29	"	"	JFK	TIST		375	JE, DB, IZ, LC	BH LM	1/1	3 5				3 5	
JUN 3	"	"	TIST	JFK		376	JE, IZ, LC, SK, JUAN MOLYNEUX, KATHERINE DARBY, STEPHANIE [illegible]	BH LM		3 8				3 8	
7	"	"	JFK	TIST		377	JE, IZ, LC, SK, STEFANIE TDOWELL, RUSLANA KORSHUNOVA	LV LM	1/	3 7				3 7	
24	"	"	ABQ	JFK		380	JE, IZ, LC, SK, ST	LV LM		3 9				3 9	
JUL 4	"	"	TIST	JFK		382	JE, LC, NM, IZ	LV LM		3 8				3 8	
8	"	"	JFK	TIST		383	JE, NM, SK, ST	LV BH		3 7				3 7	
12	"	"	TIST	JFK		384	JE, NM, SK, ST	BH LM		3 7				3 7	
14	"	"	JFK	EGGW		385	JE, GM, DB, SK	BH LM	1/1	6 5				6 5	
							Page Total		6/5	64 0		3 3		64 0	
							Amount Forward		6842 / 6445	9940 0	3 3	129 4	2176 8	7763	2 4
							Total to Date		6848 / 6450	10,004 0	3 3	132 7	2176 8	7827	2 4

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Instructions

Instructions

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL	HEL/LAN
JUL 18	B-727-31H	N908JE	EGGW	LFPB		386	JE, GM, SK BH LM		1 0				1 0	
20	"	"	LFPB	JFK		387	JE, SK BH LM	1/1	7 7				7 7	
22	"	"	JFK	PBI		388	JE, SK, JK, JOULIA STAROOOUMOVA BH LM		3 0				3 0	
23	G-1159B	N909JE	PBI	TIST		1890	JE, SK, JK, JOULIA STARODOUMOVA LV		2 6				2 6	
23	"	"	TIST	EWR		1891	JE, SK, JK, JOULIA STARODOUMOVA LV	0/	3 6				3 6	
AUG 16	"	"	TEB	EGGW		1896	JIM WORDEN	1/1	6 5				6 5	
17	"	"	EGGW	LEIB		1897	GM JW	1/1	2 5				2 5	
19	"	"	LEIB	EGGW		1898	GM JW		2 3				2 3	
25	"	"	EGGW	LFTH		1899	GM JW	1/1	1 7				1 7	
28	"	"	LFTH	LFBC		1900	GM, KEVIN MAXWELL, LADY ROBIN INNES KER JW	1/1	1 2				1 2	
28	"	"	LFBC	EGGW		1901	GM, KEVIN MAXWELL, LADY ROBIN INNES KER JW	1/1	1 5				1 5	
SEP 1	"	"	EGGW	EGPH		1902	GM, PRINCE ANDREW - DUKE OF YORK, KATIE BRAEME, CRASNASKY JW	1/1	1 0				1 0	
2	"	"	EGPH	CYQX		1903	GM JW	1/1	4 5				4 5	
2	"	"	CYQX	TEB		1904	GM JW	1/1	2 8				2 8	
22	B-727-31H	N908JE	EWR	MIA		398	JE, DANA BURNS, IGOR ZINOVIEV, TATYANA SIMANAVA BH LM	1/1	2 5				2 5	
22	"	"	MIA	TIST		399	JE, DANA BURNS, IGOR ZINOVIEV, TATYANA SEMANAVA BH LM	1/	2 5				2 5	
23	"	"	TIST	VQQ		400	[illegible] BH LM		2 9				2 9	
24	G-1159B	N909JE	TEB	TIST		1905	GM, JENNIFER KALIN, LANCE CALLOWAY, NADIA MARCINKOVA LV		3 6				3 6	
OCT 2	"	"	TIST	BED		1906	JE, NADIA MARCINKOVA, SARAH KELLEN LV	1/1	3 9				3 9	
							Page Total	12/11	57 3				57 3	
							Amount Forward	6848 / 6450	10,004 0	3 3	132 7	2176 8	7827 2	4
							Total to Date	6860 / 6461	10,061 3	3 3	132 7	2176 8	7884 5	4

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR 000084

Instructions

Date 2006	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
OCT 2	G-1159B	N909JE	BED	TEB		1907	JE, NADIA MARCINKOVA, SARAH KELLEN, DANA BURNS, ANDREA WILLIS LV		9				
6	"	"	TEB	TIST		1908	JE, LANCE CALLOWAY, NADIA MARCINKOVA, NATALYA MALYSHOV, VANESSA LV		4 4				4
26	"	"	TIST	TEB		1913	JE, BARBARA MOSKOVA, LANCE CALLOWAY, NADIA MARCINKOVA, SARAH KELLEN BH	1/1	4 2				4
27	"	"	TEB	TIST		1914	JE, NADIA MARCINKOVA BH		3 4				3
NOV 8	"	SIMULATOR	DFW	DFW			JOHN CASEY-INSTRUCTOR, FRANK MCAFEE-CREW / STEEP TURNS, STALLS, CIRCLING APP, HOLDING, RTO, SE ILS		4 0				4
9	"	"	DFW	DFW			NORM THOMPSON-INSTRUCTOR, FRANK MCAFEE-CREW / NO FLAP LANDING, EM, DESCENT, WIND SHEAR, 2 EO		4 0				4
13	B-727-31H	N908JE	ABQ	TIST		405	JE, JENNIFER KALIN, NADIA MARCINKOVA LV LM	/1	4 9				4
20	"	"	TIST	EWR		406	JE, JENNIFER KALIN, IGOR ZINOVIEV, LANCE CALLOWAY, VANESSA BRUELER, NM LV LM		3 7				3
21	"	"	EWR	ABQ		407	JE, JK, NM, SK, KATHRYN RUCKA, VANESSA BRUELER, IZ, LV LM		4 3				4
25	"	"	ABQ	TIST		408	JE, IZ, NM, SK LV LM		5 1				5
27	BHT-407	N491GM	PBI	FXE			TO CAV AIR FOR MAINT				5		
27	"	"	FXE	PBI			FROM CAV AIR FOR MAINT				5		
DEC 1	B-727-200	SIMULATOR	MIA	MIA			WILLIAM LEONARDO-INSTRUCTOR, ZACK ADAMS-CREW, RICARDO-CREW / LOSS OF ALL GENERATORS, FLAP ASSYMETRY, 2 ENGINES INOP		2 0				2
1	"	"	MIA	MIA			REY BARZANA-INSTRUCTOR, WILLIAM LEONARDO-CREW, ZACK ADAMS-CREW		2 0				2
10	G-1159B	N909JE	EWR	TIST		1919	JE, JENNIFER KALIN, SARAH RANSOM, NATALYA MALYSHEV LV	1/	3 4				2
14	"	"	TIST	EWR		1920	JE, NADIA MARCINKOVA, SARAH RANSOM LV		3 9				3
21	"	"	EWR	PBI		1921	GERALD LEFCOURT JIM WURZEN	1/1	2 5				2
21	"	"	PBI	ISP		1922	GERALD LEFCOURT JIM WURZEN	1/	2 5				2
2007 JAN 7	B-727-31H	N908JE	TIST	EWR		416	JE, GM, IZ, NM, NATALYA MALYSHOV, VALDSON COTRIN, JOHN A MCCLUNG, PRALAYA CUOMO BH LM	1/1	3 9				3
							Page Total	5/4	59 1		1 0		5[illegible]
							Amount Forward	6860 6461	10,061 3	3 3	132 7	2176 8	789[illegible]
							Total to Date	6865 6465	10,120 4	3 3	133 7	2176 8	794[illegible]

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Manoeuvers, Endorsements		Number of Landings	Airplane		Glider		Helicopter		SEL		MEL	
JAN 12	B-727-31H	N908JE	EWR	TIST		417	JE, IZ, WALTER CRONKITE, NM, SK, LC, JOHN AMERLING	BH LM		3	3							3	
16	"	"	TIST	BED		418	JE, IZ, LC, NM, SK MARTIN NOWAK, PRALBYD CUOMO	LV LM		3	7							3	
16	"	"	BED	EWR		419	JE, NM, SK	LV LM		1	2							1	
20	"	"	EWR	LFPB		420	JE, GM, LC, NM, SK	RICK SEMANSKI LV LM	/1	6	7							6	
21	"	"	LFPB	EDDM		421	JE, SK, NM	RS LV LM		1	4							1	
22	"	"	EDDM	LFPB		422	JE, SK, NM	RS LV LM		1	6							1	
27	"	"	LFPB	EWR		423	JE, SK, NM, LC, JLB	RS LV LM		7	6							7	
31	"	"	EWR	TIST		424	JE, ANDREW FARGUS, IZ JK, NM	BH GEORGE GEVER		3	3							3	
FEB 11	BHT-407	N491GM	TIST	LSJ				LV BH							1				
11	"	"	LSJ	TIST				LV BH							1				
12	B-727-31H	N908JE	TIST	BED		425	JE, CATHERINE DERBY, JK NM	LV BH		3	8							3	
12	"	"	BED	EWR		426	JE, CATHERINE DERBY, JK NM	LV BH		1	0							1	
20	"	"	TIST	EWR		428		LV BH		4	0							4	
20	G-1159B	N909JE	ISP	EWR		1923	LARRY VISOSKI	BH			9							2	
22	"	"	EWR	TIST		1924		LV		3	5							4	
27	"	"	TIST	EWR		1925		BH	1/1	4	1								
27	"	"	EWR	ISP		1926		BH			6								
MAR 1	B-727-200	SIMULATOR	MIA	MIA			RICK MONNER - INSTRUCTOR WILLIAM LEONARDO - CREW FERNANDO - CREW	STALLS MCA, RTO, V1 CUT		2	0							2	
2	"	"	MIA	MIA			RAY BARZANA - INSTRUCTOR WILLIAM LEONARDO - CREW CARLOS - CREW	ILS GO AROUND 2 ILS LANDING		1	5							1	
							Page Total		1/2	50	3				2			5	
							Amount Forward		6865 6465	10,120	4	3	3	133	7	2176	8	794	
							Total to Date		6866 6467	10,170	7	3	3	133	9	2176	8	799	

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Instructions

From ______ Matter/Sub-file ______ Instructions ______

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Landings	X
MAR 16	B-727-31H	N908JE	EWR	TIST		433	CLINT WUNDERLY LV	1/1	3 5				3 5		
20	"	"	TIST	PHL		434	LV CW		3 6				3 6		
20	"	"	PHL	EWR		435	LV CW		8				8		
23	G-1159B	N909JE	ISP	TIST		1927	LV	1/	3 5				3 5		
APR 12	B-727-31H	N908JE	EWR	TIST		436	LV CW	1/	3 8				3 8		
18	"	"	TIST	EWR		437	LV CW		4 1				4 1		
MAY 1	G-1159B	N909JE	TIST	EWR		1932	BH	1/1	4 0				4 0		
15	"	"	EWR	CYXU		1933	TO PAINT SHOP (CUSTOMS) LV	1/	1 5				1 5		
15	"	"	CYXU	CYCE		1934	TO PAINT SHOP LV	1/1	3				3		
17	B-727-31H	N908JE	EWR	BED		443	LV CW		9				9		
18	"	"	BED	TIST		444	LV CW	1/	3 9				3 9		
31	S-76C+	SIMULATOR	PBI	PBI			USE OF CHECKLIST, IIDS				1 5				
JUN 1	"	"	PBI	PBI			ENGINE HOT STARTS, POWER ASSURANCE CHECK				1 5			2	
2	"	"	PBI	PBI			ENGINE FAILURES AUTO ROTATION, PITCHING, PEDAL TURNS				1 5			8	
3	"	"	PBI	PBI			ENGINE FAILURE, 30 SECOND POWER, 2 MINUTE POWER, FMS, HSI, AUTO PILOT 3 AXIS				1 5			5	
5	"	"	PBI	PBI			STEEP TURNS, AUTO PILOT, FORCE TRIM, STICK TRIM, FLIGHT DIRECTOR				4 0			3	
6	"	"	PBI	PBI			ENGINE FIRE, ENGINES SHUTDOWN, CONFINED AREAS, SINGLE ENGINE LANDINGS, RTO, MIXED MODE				4 0			7	
7	"	"	PBI	PBI			FMS OPERATIONS, HOLDING, UNUSUAL ATTITUDES, SINGLE ENGINE ILS APPROACH				4 0			1	
8	"	"	PBI	PBI			BLOW LANDING GEAR DOWN, SINGLE SERVO FAILURE, DUAL SERVO FAILURE, DECUMATOR, MGB HOT OIL				3 7			9	
							Page Total	7 / 4	29 9		21 7		29 9	35	
							Amount Forward	6866 / 6467	19,170 7	33	133 9	2176 8	7993 9	457	8
							Total to Date	6873 / 6471	19200 6	33	155 6	2176 8 ✓	8023 8	492	8

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 19— 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane		Glider		Helicopter		...and Class SEL		MEL
5-6-03	BHT-407SFD	FTD	BELL, TX	BELL, TX			FADEC TRAINING							1	0			
5-7-03	"	"	BELL, TX	BELL, TX			FADEC TRAINING							1	0			
2003 JUN 9	SK-76C+	SIMULATOR	PBI	PBI			STUCK PEDALS, FIXED PITCH, CABLE FAILURE, DITCHING, AUTO ROTATIONS, CONFINED LANDING AREA, SETTLING WITH POWER, DUAL SERVO FAILURE, FIXED PITCH, BRAKE FAILURE, NO TAIL ROTOR AUTO ROTATIONS							4	0			
10	"	"	PBI	PBI										4	0			
19	B-727-31H	N908JE	EWR	TIST		450		LV CW		3	7							
22	"	"	TIST	CMH		451		LV CW	1/	4	0							
23	"	"	CMH	EWR		452		LV CW		1	4							
25	"	"	EWR	MIA		453		LV CW	1/1	2	6							
JUL 9	"	"	TIST	EWR		457		LV CW	1/1	3	8							
19	G-1159B	N909JE	CYCG	CYXU		1935	EMERGENCY - BLOW NOSE GEAR DOWN	LV		1	4							
20	"	"	CYXU	PTK		1936		LV	1/1	1	0							
21	B-727-31H	N908JE	EWR	EWR		460		LV CW	1/1	1	0							
22	"	"	EWR	TIST		461		LV CW		3	8							
22	"	"	TIST	MIA		462		LV CW		2	7							
23	B-727-200	SIMULATOR	MIA	MIA			HAL LEYO JOE GLEASON FE RECURRENT			2	0							
24	"	"	MIA	MIA			REC BARZANA - PC FE HAL LEYO JOE GLEASON			1	0							
30	G-1159B	N909JE	TIST	TEB		1940		BH	1/1	3	8							
31	"	"	TEB	MIA		1941		BH		2	7							
31	B-727-31H	N908JE	MIA	EWR		463		BH CW		2	7							
							Page Total		6/5	37	6			10	0			
							Amount Forward		6873 / 6471	10200	6	3	3	155	6	2176	8	802
							Total to Date		6879 / 6476	10238	2	3	3	165	6	2176	8	80

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Flight No.	Remarks, Procedures, Manouvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL	Helicopter Landing
AUG 12	BHT-407	N491GM	TIST	TIST						3			3
13	B-727-31H	N908JE	TIST	EWR	465	LV CW		3 7				3 7	
15	G-1159B	N909JE	MIA	PBI	1942	LV		5				5	
16	B-727-31H	N908JE	EWR	VNY	466	LV BH		5 4				5 4	
16	"	"	VNY	ABQ	467	LV BH		1 7				1 7	
21	"	"	ABQ	MIA	468	LV BH		3 6				3 6	
21	"	"	MIA	TIST	469	LV BH		2 5				2 5	
27	"	"	TIST	EWR	470	LV BH		3 7				3 7	
29	G-1159B	N909JE	PBI	TEB	1943	LV	1/1	2 5				2 5	
30	"	"	TEB	HPN	1944	LV		5				5	
30	"	"	HPN	TIST	1945	LV		3 7				3 7	
SEP 6	B-727-31H	N908JE	EWR	PBI	471	LV CW		2 4				2 4	
18	G-1159B	N909JG	TIST	TEB	1955	LV		3 6				3 6	
30	B-727-31H	N908JE	TIST	EWR	474	LV BH		3 6				3 6	
OCT 4	"	"	EWR	LFPB	475	LV BH		7 0				7 0	
12	"	"	LFPB	LPAZ	476	LV BH		3 3				3 3	
12	"	"	LPAZ	TIST	477	LV BH		5 4				5 4	
15	"	"	TIST	EWR	478	LV BH		3 7				3 7	
18	G-1159B	N909JE	TEB	BED	1956	BH	1/1	1 0				1 0	
						Page Total	2/2	57 8		3		57 8	
						Amount Forward	6879 6476	10238 2	3 3	165 6	2176 8	8061 4	5
						Total to Date	6881 6478	10296 6	3 3	165 9	2176 8	8119 2	5

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000089

From ______ Matter/Sub-file ______ Instructions ______

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL	Helicopter Landings
OCT 18	G-1159B	N909JE	BED	TIST		1957	BH		3 5				3 5	
25	"	"	EWR	TEST		1959	LV		3 6				3 6	
26	B-727-31H	N908JE	EWR	VQQ		479	LV BH		2 3				2 3	
NOV 6	G-1159B	N909JE	TIST	TEB		1962	LV	1/1	4 0				4 0	
8	"	"	TEB	TIST		1963	LV		3 8				3 8	
15	"	"	TEB	TIST		1967	BH		3 6				3 6	
17	"	"	TIST	BED		1968	BH	1/1	3 9				3 9	
17	"	"	BED	TEB		1969	BH	1/1	9				9	
21	"	"	TEB	TIST		1970	BH		3 5				3 5	
26	"	"	TIST	TEB		1971	LV		4 1				4 1	
DEC 2	"	SIMULATOR	DFW	DFW			NORM THOMPSON - INSTRUCTOR BRENT KIRBY, CREW HOLDING		4 0				4 0	
3	"	"	"	"			GUY FRONEY - INSTRUCTOR BRENT KIRBY, CREW		3 0				3 0	
11	"	N909JE	TIST	TEB		1976	LV		4 0				4 0	
13	"	"	TEB	PWM		1977	LV	1/1	1 0				1 0	
14	"	"	PWM	BED		1978	LV		8				8	
14	"	"	BED	TEB		1979	LV		1 1				1 1	
14	"	"	TEB	MIA		1980	LV		2 8				2 8	
18	"	"	TIST	PBI		1982	LV	1/1	2 8				2 8	
18	"	"	PBI	TEB		1983	LV		2 4				2 4	
							Page Total	5/5	55 1				55 1	
							Amount Forward	6981 6478	10296 0	3 3	165 9	2176 8	8119 2	514
							Total to Date	6986 6483	10351 1	3 3	165 9	2176 8	8174 3	514

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000090

CONFIDENTIAL

Date 2007	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Manoeuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
DEC 21	G-1159B	N909JE	TEB	TIST		1984		LV		3 5				3 5
2008 JAN 6	"	"	TIST	TEB		1985		LV	1/1	3 9				3 9
11	"	"	TEB	TIST		1986		LV		3 5				3 5
16	B-727-200	SIMULATOR	MIA	MIA			BUTCH GRETCHEN - INSTRUCTOR JOE GLEESON CREW, MITCH CREW			2 0				2 0
16	"	"	"	"			REY BARZANA - FE PC BUTCH GRETCHEN-CREW, MITCH-CREW			2 0				2 0
17	"	"	"	"			HAL LONG - INSTRUCTOR BUTCH GRETCHEN-CREW HOLDING			2 0				2 0
18	"	"	"	"			REY BARZANA. CAPT. PC BUTCH GRETCHEN-CREW			2 0				2 0
26	G-1159B	N909JE	EWR	TEB		1991		LV		5				5
FEB 5	"	"	TIST	TEB		1993		BH	1/1	4 2				4 2
8	"	"	TEB	SAF		1994		BH		4 4				4 4
12	"	"	SAF	MIA		1995		LV	1/	3 7				3
13	"	"	MIA	TEB		1996		BH		2 4				2 4
15	"	"	TEB	TIST		1997		BH		3 4				3
24	"	"	TIST	TEB		1998		BH		4 0				4
27	"	"	TEB	BED		1999		LV		9				
27	"	"	BED	TEB		2000		LV		1 0				1
29	"	"	TEB	TIST		2001		LV		3 5				3
MAR 6	B-727-31H	N908JE	VQQ	VQQ		480		LV BH		1 6				1
8	G-1159B	N909JE	TEB	BGD		2003		BH		8				

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
Page Total	3/2	49 3				49
Amount Forward	6886 6483	10351 1	3 3	165 9	2176 8	8174
Total to Date	6889 6985	10400 4	3 3	165 9	2176 8	8223

Date 2008	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane		Glider		Helicopter		SEL	MEL
MAR 8	G-1159B	N909JE	BED	TEB		2004	BH		1	0						1
8	"	"	TEB	ACY		2005	BH			6						
9	"	"	ACY	TEB		2006	BH	1/1		7						
16	B-727-31H	N908JE	VQQ	LCQ		981	BH LV			4						
16	G-1159B	N909JE	TIST	EWR		2010	LV		4	2						4
21	"	"	EWR	SSI		2011	LV		2	0						2
21	"	"	SSI	TIST		2012	LV		2	9						2
24	"	"	TIST	TEB		2013	LV	1/1	3	7						3
25	S-76	N908GM	MGS	RWI			LV		2	4			2	4		2
25	S-76	N908GM	RWI	HXD			LV						2	1		
26	"	"	HXD	DAB			LV	4/4					1	6		
26	"	"	DAB	PBI			LV						1	4		
28	G-1159B	N909JE	TEB	TIST		2014	LV		3	5						
APR 9	"	"	TIST	TEB		2016	BH		3	4						
15	"	"	TIST	TEB		2017	LV	1/1	3	7						
17	"	"	TEB	EINN		2018	LV		6	1						
18	"	"	EINN	LFPB		2019	LV		1	6						
22	"	"	LFPB	LLBG		2020	LV	1/	4	2						
25	"	"	LLBG	LGIR		2021	LV		1	5						
							Page Total	4/3	39	5			7	5		
							Amount Forward	6889 6485	10400	4	3	3	165	9	2176	8 82
							Total to Date	6893 6488	16439	9	3	3	173	4	2176	8 82

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2008	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
APR 25	G-1159B	N909JE	LGIR	LFPB		2622	LV		3 4				3 4
29	"	"	LFPB	CYJT		2623	LV	1/1	5 8				5 8
29	"	"	CYJT	TEB		2624	LV	1/1	2 5				2 5
MAY 17	"	"	TIST	TEB		2628	BH	1/1	4 1				4 1
22	"	"	TEB	TIST		2629	LV		3 5				3 5
23	BHT-407	N491GM	LSJ	TIST			LV				2		
26	"	"	LSJ	LSJ			NVH				2		
27	G-1159B	N909JE	TIST	TEB		2630	LV	1/1	3 8				3 8
29	B-727-31H	N908JE	PBI	LCQ		483	LV BH		9				9
29	G-1159B	N909JE	TEB	MIV		2631	BH						7
31	B-727-31H	N908JE	LCQ	VQQ		484	LV BH		4				4
JUN 11	G-1159B	N909JE	TIST	PDK		2634	BH	1/1	3 9				3 9
11	"	"	PDK	TEB		2635	BH	1/	1 9				1 9
JUL 2	B-727-31H	N908JE	VQQ	PBI		485	BH LV		9				9
AUG 18	B-727-200	SIMULATOR	MIA	MIA			RAY BARZANA - FE PC HAL LASKO-CREW, BUTCH GRESLBEN-CREW		2 0				2 0
OCT 21	G-1159B	N909JE	PBI	PBI		2048	LV		1 1				1 1
NOV 20	"	"	"	"		2044	LV	3/3	1 0				1 0
22	"	"	"	SEF		2045	LV		5				5
22	"	"	SEF	PBI		2046	LV		5				5
							Page Total	9/8	36 9		4		36 9
							Amount Forward	6893 / 6988	10439 9	3 3	173 4	2176 8	8263
							Total to Date	6902 / 6496	10476 8	3 3	173 8	2176 8	8300

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2008	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
DEC 9	B-727-31H	N908JE	PBI	LCQ		486				1.0				1.0
2009 JAN 5	G-1159B	SIMULATOR	DFW	DFW			STALLS, STEEP TURNS, CIRCLING APPROACH, MISSED APPROACH, V-1 CUT, HOT BLEED HUMPG			3.0				3.0
6	"	"	"	"			WINDSHEAR, RTO, NO FLAP LANDING SE ILS SE GOAROUND, ELT HYD FAILURE			3.0				3.0
FEB 4	B-727-200	"	MIA	MIA			FE WARMUP HAL LEXO-INSTRUCTOR	LV LM		1.5				1.5
4	"	"	"	"			FE PC-RAY BARZANO HAL LEXO	LV LM		1.5				1.5
4	"	"	"	"			CAPTAIN WARMUP HAL LEXO INSTRUCTOR	LV LM		1.5				1.5
4	"	"	"	"			CAPTAIN PC-RAY BARZANO	LV LM		1.5				1.5
28	B-727-31H	N908JE	LCQ	PBI		487		LV LM	1/1	1.0				1.0
MAR 7	G-1159B	N909JE	PBI	MYNN		2648		LV		.7				.7
7	"	"	MYNN	PBI		2649		LV		.8				.8
MAY 7	B-727-31H	N908JE	PBI	PBI		488		LV LM		.9				.9
JUL 10	G-1159B	N909JE	PBI	PBI		2650		LV		.9				.9
13	"	"	PBI	PBI		2651		LV		.7				.7
SEP 25	B-727-200	SIMULATOR	MIA	MIA				LV LM		1.5				1.5
25	"	"	"	"						1.5				1.5
OCT 19	B-727-31H	N908JE	PBI	VQQ		489		LV LM	1/1	.9				.9
NOV 30	G-1159B	N909JE	PBI	PBI		2652		LV		1.2				1.2
2010 JAN 6	"	"	PBI	TEB		2653		LV		2.5				2.5
6	"	"	TEB	PBI		2654		LV		2.5				2.5
							Page Total		2/2	28.1				28.1
							Amount Forward		6902 6496	10476.8	3.3	173.8	2176.8	8300.0
							Total to Date		6904 6498	10504.9	3.3	173.8	2176.8	8328.1

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL
JAN 12	G-1159B	N909JE	PBI	TEB		2055	LV		2.9			
13	"	"	TEB	PBI		2056	LV		2.4			
15	"	"	PBI	TIST		2057	LV	1/1	2.4			
15	"	"	TIST	PBI		2058	LV		2.8			
FEB 1	"	"	PBI	TEB		2059	LV		2.4			
2	"	"	TEB	BED		2060	LV		.9			
2	"	"	BED	TEB		2061	LV		.9			
2	"	"	TEB	BCT		2062	LV		2.8			
5	"	"	BCT	TIST		2063	LV		2.3			
5	"	"	TIST	PBI		2064	LV		2.9			
10	G-1159A	SIMULATOR	DFW	DFW			HOLDING PATTERNS WALT PLGNTES		3.4			
11	"	"	DFW	DFW			HOLDING WALT PLGNTES		3.4			
16	G-1159B	N909JE	PBI	TIST		2065	LV		2.4			
16	"	"	TIST	PBI		2066	LV	1/1	2.9			
18	"	"	PBI	TEB		2067	LV	1/1	2.6			
19	"	"	TEB	PBI		2068	LV		2.6			
23	"	"	PBI	TEB		2069	LV	1/1	2.5			
24	"	"	TEB	PBI		2070	LV		2.8			
27	B-727-31H	N908JE	VQQ	PBI		490	LV LM		1.0			
							Page Total	4/4	46.3			
							Amount Forward	6904 6498	10504.9	3.3	173.8	2176.8
							Total to Date	6908 6502	10551.2	3.3	173.8	2176.8

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Instructions

Instructions

Date ~~19~~ 2010	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... Airplane	Glider	Helicopter		...and Class SEL	MEL
MAR 2	G-1159B	N909JE	PBI	TEB		2671		LV	1/1	2 4					2 4
3	"	"	TEB	BCT		2672		LV		3 0					3 0
5	"	"	BCT	TIST		2673		LV	/1	2 3					2 3
5	"	"	TIST	PBI		2674		LV		2 9					2 9
15	B-727-200	SIMULATOR	MIA	MIA			FE RECURRENT	RAY BARZOWSKI LV HAL LGXO		1 5					1 5
15	"	"	"	"			HOLDING CAPT RECURRENT	RAY BARZOWSKI LV HAL LGXO		1 5					1 5
22	G-1159	N530GA	PBI	PTK			JOHN ROBERTS			2 4					2 4
25	G-1159B	N909JE	PBI	TEB		2075		LV	1/1	2 5					2 5
26	"	"	TEB	PBI		2076		LV		2 6					2 6
29	"	"	PBI	TIST		2077		LV	/1	2 3					2 3
29	"	"	TIST	PBI		2078		LV		2 9					2 9
APR 7	"	"	PBI	TEB		2079		LV	1/1	2 4					2 4
8	"	"	TEB	PBI		2080		LV		2 7					2 7
19	"	"	PBI	BED		2081		LV	1/1	2 6					2 6
19	"	"	BED	TEB		2082		LV		9					9
20	"	"	TEB	PBI		2083		LV		2 6					2 6
29	"	"	PBI	TEB		2084		LV	1/1	2 6					2 6
30	"	"	TEB	PBI		2085		LV		2 5					2 5
MAY 2	B-727-200	SIMULATOR	MIA	MIA			BILL HAMMOND CHECK RIDE	LV BH		1 5					1 5
							Page Total		5/7	44 1					44 1
							Amount Forward		6908 6502	10551 2	3 3	173 8		2176	8 8374 4
							Total to Date		6913 6509	10595 3	3 3	173 8		2176	8 8418 5

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR_000096

CONFIDENTIAL

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane		Glider	Helicopter		SEL	ME
MAY 6	B-727-31H	N908JE	PBI	PBI		491		LV BH		1	5					
13	G-1159B	N909JE	PBI	TIST		2086		BH	1/1	2	4					
13	"	"	TIST	PBI		2087		BH	1/1	2	5					
20	"	"	PBI	TEB		2088		LV	1/1	2	5					
21	"	"	TEB	PBI		2089		LV		2	4					
31	"	"	PBI	TIST		2090		LV	1/1	2	4					
31	"	"	TIST	PBI		2091		LV		2	7					
JUN 2	"	"	PBI	TEB		2092		LV	1/1	2	4					
3	"	"	TEB	PBI		2093		LV		2	7					
9	"	"	PBI	TIST		2094		LV	1/1	2	5					
9	"	"	TIST	PBI		2095		LV		2	5					
10	"	"	PBI	TEB		2096		LV	1/1	2	5					
11	"	"	TEB	PBI		2097		LV		2	4					
17	"	"	PBI	TEB		2098		LV	1/1	2	5					
18	"	"	TEB	PBI		2099		LV		2	4					
29	B-727-200	SIMULATOR	MIA	MIA			LARRY MORRISON 6 MONTH CHECK	EX EM		1	5					
JUL 1	G-1159B	N909JE	PBI	TIST		2102		LV	1/1	2	6					
2	"	"	TIST	PBI		2103		LV		2	6					
15	"	"	PBI	TIST		2106		LV	1/1	2	5					
							Page Total		16/10	45	5					
							Amount Forward		6913 6509	10595	3	3	3 173	8	2176	88
							Total to Date		6923 6519	10640	8	3	3 173	8	2176	88

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter Landings
JUL 16	NEG-1159B	N909JE	TIST	BCT		2107		LV		2 6				2 6	
20	"	"	BCT	TEB		2108		LV		2 4				2 4	
25	"	"	TEB	LFPB		2109		LV		7 2				7 2	
AUG 2	"	"	LFPB	CYQX		2110		LV	1/1	5 7				5 7	
2	"	"	CYQX	TEB		2110		LV	1/	2 8				2 8	
25	"	"	TEB	PHX		2116		LV	1/1	4 7				4 7	
25	"	"	PHX	ABQ		2117		LV	1/	9				9	
30	"	"	ABQ	TEB		2118		LV		3 8				3 8	
SEP 2	"	"	TEB	TIST		2119		LV	1/	3 7				3 7	
12	"	"	TIST	BED		2120		LV		4 0				0	
12	"	"	BED	TEB		2121		LV		1 0				1 0	
19	"	"	TEB	TIST		2122		LV	1/1	3 7				3 7	
21	"	"	TIST	TEB		2123	NADIA MARCINKOVA FLEW IN THE RIGHT SEAT, I SAT ON JUMPSEAT	LV		0				0	
26	"	"	TEB	EGGP		2124	DIVERTED TO ALTERNATE	LV	/1	6 5				6 5	
27	"	"	EGGP	EGGW		2125		LV	1/1	7				7	
29	"	"	EGGW	LFPB		2126		LV		1 1				1 1	
OCT 18	"	"	LFPB	EGGW		2127	DIVERTED TO EGGW BEFORE ENTERING TRACKS, SMOKING DV window	LV	1/1	2 8				2 8	
19	"	"	EGGW	BGR		2128	EMPTY	LV		6 8				6 8	
19	"	"	BGR	TEB		2129	EMPTY	LV		1 4				1 4	
							Page Total		8/6	61 8				61 8	
							Amount Forward		6923 / 6519	10640 8	3 3	173 8	2176 8	8464 6	517
							Total to Date		6931 / 6525	10702 6	3 3	173 8	2176 8	8525 8	517

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Instructions

Date 2010	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SGL	MEL	LANDING / HELICOPTER
OCT 24	G-1159B	N909JE	TEB	TIST		2130		LV	1/1	3 5				3 5	
27	B-727-31H	N908JE	PBI	PBI		492		LV LM	3/3	1 7				1 7	
29	G-1159B	N909JE	TIST	EWR		2131		LV		3 6				3 6	
29	"	"	EWR	CPS		2132	EMPTY	LV		2 2				2 2	
NOV 30	"	"	CPS	TEB		2133	EMPTY	LV	1/1	2 0				2 0	
DEC 7	"	"	TEB	ABQ		2134		LV		4 0				4 0	
13	"	"	ABQ	TEB		2135		LV	1/	3 7				3 7	
19	"	"	TEB	TIST		2136		LV		3 8				3 8	
30	"	"	TIST	TEB		2137		LV	1/	4 0				4 0	
2011 JAN 6	"	"	TEB	TIST		2138		LV		3 7				3 7	
17	"	"	TIST	PBI		2139		LV	1/1	2 9				2 9	
18	"	"	PBI	TEB		2140		LV		2 4				2 4	
FEB 2	G-1159A	SIMULATOR	DFW	DFW			HOLDING			2 0				2 0	
2	"	"	"	"						2 0				2 0	
3	"	"	"	"			HOLDING		3/3	2 0				2 0	
3	"	"	"	"						2 0				2 0	
6	G-1159B	N909JE	TEB	TIST		2141			1/	3 5				3 5	
10	G-1159SP	N530GA	PBI	TEB			JOHN ROBERTS			2 4				2 4	
13	G-1159B	N909JE	TEB	BED		2143		LV	1/1	9				9	
							Page Total		13/10	52 3 / 67 9				52 3	
							Amount Forward		6931 6525	10702 6	3 3	173 8	2176 8	8525 8	51
							Total to Date		6944 6535	10754 9	3 3	173 8	2176 8	8578 1	51

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... Airplane	Glider	Helicopter	...and Class SEL	MEL
FEB 13	G-1159B	N909JE	BED	PBI		2144	LV		2 7				2 7
16	"	"	PBI	TIST		2145	LV		2 4				2 4
18	S-76C++	N722JE	TIST	LSJ			LV		3		3		3
19	"	"	LSJ	TISX			LV		3		3		3
19	"	"	TISX	LSJ			LV				3		
19	"	"	LSJ	TIST			LV				1		
20	"	"	TIST	LSJ			LV				1		
20	"	"	LSJ	TIST			LV				1		
20	G-1159B	N909JE	TIST	TEB		2146	LV	1	4 2				4 2
26	"	"	TEB	ABQ		2147	LV		5 0				5 0
MAR 1	"	"	ABQ	LGB		2148	LV	1/1	1 0				1 0
4	"	"	LGB	ABQ		2149	LV		1 6				1 6
10	"	"	ABQ	CPS		2150	LV	1/1	2 2				2 2
26	"	"	CPS	TEB		2151	LV		1 8				1 8
26	"	"	TEB	TIST		2152	LV		3 4				3 4
27	"	"	TIST	MDPC		2153	LV	1/1	8				
27	"	"	MDPC	TIST		2154	LV	1/1	8				
27	"	"	TIST	MDPC		2155	LV	1/1	9				
28	"	"	MDPC	TIST		2156	LV		9				
							Page Total	6/5	28 6		1 2		28
							Amount Forward	6944 6535 6950	10754 9	3 3	173 8	2176 8	8578
							Total to Date	6540	10783 5	3 3	175 0	2176 8	8606

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
MAR 29	G-1159B	N909JE	TIST	TEB		2157	LV	1/	4 1				4 1
30	S-76C++	N722JE	TEB	4N1			TWA CONSOLL AJSON TURNGO INTO A RESTAURANT G. RENSTRA LV				3		
30	"	"	4N1	TEB			GEORGE RENSTRA LV				3		
30	"	"	TEB	POU							8		
APR 13	B-727-200	SIMULATOR	SFB	SFB			DICK GARZA - INSTRUCTOR HOLDING BILL DAVIDSON - CREW, BARRY - CREW		2 0				2 0
13	"	"	"	"			DICK GARZA - INSTRUCTOR BILL DAVIDSON - CREW BARRY CREW		2 0				2 0
14	"	"	"	"			SAME AS ABOVE CAPT CHECK KEN [illegible] - FAA EXAMINER		2 0				2 0
14	"	"	"	"			SAME AS ABOVE FE CHECK		2 0				2 0
26	B-727-31H	N908JE	PBI	BQK			TIM POWELL LV		1 2				1 2
30	G-1159B	N909JE	TIST	TEB		2159	LV	1/1	3 8				3 8
MAY 14	"	"	TEB	LFPB		2160	LV		7 4				7 4
16	"	"	LFPB	GOOY		2161	LV	1/1	6 3				6 3
20	"	"	GOOY	GVAC		2162	LV		1 2				1 2
20	"	"	GVAC	TIST		2163	LV		6 4				6 4
22	"	"	TIST	TEB		2164	LV	1/1	4 1				4 1
JUN 6	BHT-407	N491GM	PBI-F45-PBI				RANDY ROWLES - EXAMINER BELL SCHOOL				1 6		
8	"	"	PBI-LNA-PBI				SAME AS ABOVE FULL POWER AUTOS				1 4		
26	G-1159B	N909JE	TIST	TEB		2166	LV	1/1	4 0				4 0
30	"	"	TEB	PBI		2167	LV		2 4				2 4
							Page Total	5/4	48 9		4 4		48 9
							Amount Forward	6950 / 6540	10783 5	3 3	175 0	2176 8	8606 7
							Total to Date	6955 / 6544	10832 4	3 3	179 4	2176 8	8655 6

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane		Glider		Helicopter		SEL	MEL		Landings (Helicopter)		XC
JUL 4	G-1159B	N909JE	PBI	TEB		2168		LV	1/1	2	4						2	4			2
9	"	"	TEB	ASE		2169		LV		3	9						3	9			3
9	"	"	ASE	ABQ		2170		LV		1	2						1	2			1
14	"	"	ABQ	BFI		2171		LV	1/1	2	8						2	8			2
15	"	"	BFI	APC		2172		LV		1	6						1	6			1
17	"	"	APC	TEB		2173		LV	/1	5	1						5	1			5
19	"	"	TEB	TIST		2174		LV		3	5						3	5			3
20	"	"	TIST	TEB		2175		LV	1/1	4	0						4	0			4
25	B-727-200	SIMULATOR	MIA	MIA			CAPTAIN WARM UP HOLDING			2	0						2	0			
25	"	"	"	"			FG WARM UP			2	0						2	0			
26	"	"	"	"			CAPTAIN CHECK RIDE PART 125 HARRY BROWN-GKAM ENGR. HOLDING			1	0						1	0			
26	"	"	"	"			FE CHECK RIDE PART 125 HARRY BROWN-GKAMSNER			1	0						1	0			
28	G-1159B	N909JE	TEB	PBI		2176	1 SAT ON JUMP SEAT				0							0			
28	"	"	PBI	PBI		2177	3 TAKE TAKE-OFF + LANDINGS FOR NADIA MARCINKO FROM THE LEFT SEAT		3/3	1	1						1	1			
AUG 3	B-727-31H	N908JE	BQK	PBI		494		LV LM	1/1	1	1						1	1			1
31	BHT-407	N491GM	TIST	LSJ				LV	[illegible]						3				1	*	
31	"	"	LSJ	LSJ				LV	[illegible]						7				8		
SEP 4	G-1159B	N909JE	SWF	TIST		2180		LV NM	1/	3	9						3	9			
13	"	"	TEB	TIST		2182		LV	1/	3	8						3	8			
							Page Total		9/8	40	4			1	0		40	4	9		3[illegible]
							Amount Forward		6955 6544	10832	4	3	3	179	4	2176 8	8655	6	536		917
							Total to Date		6964 6552	10872	8	3	3	180	4	2176 8	8696	0	545		920

I certify that the statements made by me on this form are true.

Pilot's Signature [signature]

Date 2011	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter Landings
NOV 21	B-727-200	SIMULATOR	MIA	MIA			FG CHECK RIDE PARTS 125 LV REGS GARDONA		1 0				1 0	
25	"	"	"	"			CAPTAIN PC REY BORLAND HOLDING LM		2 0				2 0	
DEC 1	B-727-31H	N908JE	PBI	PBI		495	RVSM TEST FLIGHT LV LM		1 6				1 6	
3	"	"	PBI	PBI		496	DEMO FLIGHT FOR QATAR ENTOURAGE LV LM	✓/1	1 1				1 1	
13	"	"	PBI	VQQ		497	MAINTENANCE LV LM		9				9	
2012 JAN 8	G-1159B	N909JE	TEB	MHT		2193	LV	1/1	9				9	
8	"	"	MHT	LFPB		2194	LV	/1	6 1				6 1	
16	"	"	LFPB	GMMX		2195	LV		3 0				3 0	
17	"	"	GMMX	DIAP		2196	LV	✓/1	4 2				4 2	
18	"	"	DIAP	GVAC		2197	LV		3 6				3 6	
18	"	"	GVAC	TIST		2198	LV		7 1				7 1	
23	BHT-407	N491GM	LSJ	TIST			LV				2			1
24	G-1159B	N909JE	TIST	PBI		2199	LV		2 9				2 9	
FEB 12	G-1159A	SIMULATOR	DFW	DFW			FMS APPROACHES, FMS HOLDING, COLD WX STALLS, NO FLAP LANDING, HOLDING		3 0				3 0	
13	"	"	"	"			HIGH ALT VOR OPERATIONS, EMERGENCY DESCENT, RTO, ED LACKEY-GRGAS CFI		2 0				2 0	
MAR 6	B-727-31H	N908JE	VQQ	VQQ		498	JIM BORTIKOWSKY LV		5				5	
6	"	"	VQQ	PBI		498	LV JB		9				9	
16	"	"	PBI	JFK		499	LV JB		2 4				2 4	
17	"	"	JFK	LFPB		500	LV JB		7 5				7 5	
							Page Total	3/4	50 7		2		50 7	1
							Amount Forward	6464 / 6552	10872 8	3 3	180 4	2176 8	8696 0	545
							Total to Date	6467 / 6556	10923 5	3 3	180 6	2176 8	8746 7	546

I certify that the statements made by me on this form are true.

Pilot's Signature: David Rodgers

CONFIDENTIAL DR_000103

Date 2012	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL	Helicopter Landings
MAR 19	B-727-31H	N908JE	LFPB	EGHL		S01	LASHAM MAINT	1/1	1 0				1 0	
APR 18	G-1159B	N909JE	TEB	TIST		2207	LV		3 7				3 7	
30	B-727-200	SIMULATOR	MIA	MIA			WARM UP AS CAPTAIN AND FLIGHT ENGINEER HOLDING LV		4 0				4 0	
MAY 1	"	"	"	"			CAPT DE HAFE PC HOLDING LV HARRY BROWN · GROMSNGL [?] JOG BRYANT		4 0				4 0	
3	G-1159B	N909JE	TIST	PBI		2208	LV		2 7				2 7	
4	"	"	PBI	TEB		2209	LV	1/1	2 5				2 5	
JUL 8	"	"	TEB	TIST		2212	LV		3 5				3 5	
20	"	"	TIST	TIST		2213	LV	3/3	2				2	
21	"	"	TIST	TEB		2214	LV	1/1	3 8				3 8	
26	"	"	TEB	PBI		2215	LV		2 4				2 4	
30	"	"	PBI	CNW		2216	LV	1/1	2 4				2 4	
30	"	"	CNW	ABQ		2217	LV	1/1	1 5				1 5	
AUG 5	"	"	ABQ	SFO		2218	LV		2 3				2 3	
6	"	"	SFO	ABQ		2219	LV		2 1				2 1	
18	"	"	ABQ	TEB		2220	LV		3 6				3 6	
22	"	"	TEB	IAD		2221	LV	1/1	9				9	
22	"	"	IAD	PBI		2222	LV	1/	2 3				2 3	
26	"	"	PBI	TIST		2223	LV		2 6				2 6	
SEP 6	"	"	TIST	TEB		2224	LV	1/	3 8				3 8	
							Page Total	11/9	49 3				49 3	
							Amount Forward 6967	~~6567~~ 6556	10923 5	3 3	180 6	2176	8 8746	7 5
							Total to Date	6978 6565	10972 8	3 3	180 6	2176	8 8796	0 5

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2012	Aircraft Make and Model	Aircraft Identification Mark	Points of Departure & Arrival From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Aircraft Category... AIRPLANE	GLIDER	HELICOPTER	...and Class SEL	MEL
SEP 13	G-1159B	N909JE	TEB	ABQ		2225	LV		4 1				4
18	"	"	ABQ	ONT		2226	LV	1/1	1 6				1
19	"	"	ONT	TEB		2227	LV		4 8				4
28	"	"	TEB	PBI		2228	LV	1/1	2 5				2
OCT 1	"	"	PBI	TIST		2229	LV		2 6				2
6	"	"	TIST	TEB		2230	LV	1/	3 7				3
24	B-727-31H	N908JE	EGHL	EGSS		562	LASHAM TO STANSTED JIM BARSKOWSKI LV		7				
28	G-1159B	N909JE	TEB	TIST		2231	LV	1/1	3 9				3
NOV 12	B-727-200	SIMULATOR	MIA	MIA			FE PC MARCELLO MARINO CHRIS HIGGINS LV		2 0				2
12	"	"	"	"			CAPTAIN PC HOLDING HARRY BROWN CHRIS HIGGINS LV		2 0				2
20	G-1159B	N909JE	TEB	PBI		2235	LV		2 5				2
25	"	"	PBI	MDW		2236	LV		2 8				2
26	"	"	MDW	TEB		2237	LV		1 6				1
DEC 6	B-727-31H	N908JE	EGSS	EGSS		503	LV CH	1/1	7				
7	"	"	EGSS	JFK		504	LV CH		8 2				
14	"	"	JFK	TIST		505	LV CH	1/	3 7				
2013 JAN 10	"	"	TIST	PBI		506	LV CH		2 8				
17	G-1159B	N909JE	TEB	PBI		2239	LV		2 9				2
21	"	"	PBI	TEB		2240	LV		2 7				2
							Page Total	6/4	55 8				5
							Amount Forward	6978 6565	10972 8	3 3	180 6	2176	887
							Total to Date	6984 6569	11028 6	3 3	180 6	2176	888

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2013	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements		Number of Landings	Airplane	Glider	Helicopter	...and Class SEL
FEB 7	B-727-31H	N908JE	PBI	BQK		567		LV CH	1/1	1 1			
13	G-1159A	SIMULATOR	DFW	DFW			RICKY GREAVES - INSTRUCTOR HOLDING	JOE FERNANDEZ		2 0			
14	"	"	"	"			SAME AS ABOVE HOLDING		3/3	2 0			
16	G-1159B	N909JE	TEB	PBI		2245		LV	1/1	3 0			
18	"	"	PBI	TEB		2246		LV	●	2 8			
22	"	"	TEB	ABQ		2247		LV	1/	4 9			
24	"	"	ABQ	LGB		2248		LV		1 7			
26	"	"	LGB	TEB		2249		LV		4 8			
MAR 1	"	"	TEB	PBI		2250	BILL GATES	LV		2 5			
19	"	"	TIST	TEB		2252		LV	1/1	4 2			
APR 5	"	"	TEB	TIST		2256		LV	1/1	3 6			
21	"	"	TIST	TEB		2257		LV	1/1	3 8			
25	"	"	TEB	ASE		2258		LV	1/1	4 3			
25	"	"	ASE	ABQ		2259		LV	1/1	1 0			
25	"	"	ABQ	TUL		2260		LV	1/1	1 3			
29	"	"	TUL	VNY		2261		LV		3 0			
30	"	"	VNY	TEB		2262		LV	1/	4 9			
MAY 6	"	"	TEB	TIST		2263		LV		3 8			
12	"	"	TIST	PBI		2264		BILL MURPHY	1/1	2 7			
							Page Total		14/12	57 4			
							Amount Forward		6984 6569	11028 6		33 180 6	2176 8
							Total to Date		6998 6581	11086 0		33 180 6	2176 8

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

Date 2013	Aircraft Make and Model	Aircraft Identification Mark	From	To	Miles Flown	Flight No.	Remarks, Procedures, Maneuvers, Endorsements	Number of Landings	Airplane	Glider	Helicopter	SEL	MEL
MAY 15	G-1159B	N909JE	PBI	TIST		2265	LV		2 3				2 3
22	"	"	TIST	ISP		2266	DARREN ROTHELL [illegible]	1/1	3 6				3 6
24	"	"	ISP	TEB		2267	LV	1/1	8				
24	"	"	TEB	TIST		2268	LV	1/	3 7				3 7
JUN 3	"	"	TIST	ISP		2269	LV		3 9				3 9
6	"	"	ISP	LFPB		2270	LV	/1	7 0				7
15	"	"	LFPB	LPAZ		2271	LV		3 9				3
16	"	"	LPAZ	TIST		2272	LV		5 6				5
24	"	"	TIST	TEB		2273	LV	1/1	3 9				3
JUL 17	"	"	TIST	TEB		2276	BILLY DIMAURO	1/1	3 8				3
19	"	"	TEB	BED		2277	LV		9				
19	"	"	BED	TIST		2278	LV		3				3
25	"	"	TIST	PBI		2279	LV	1/1	2 6				2
26	"	"	PBI	TEB		2280	LV		2 5				2
AUG 1	"	"	TEB	ABQ		2281	BILLY DIMAURO	1/1	4 2				4
3	"	"	ABQ	LAS		2282	BD	1/1	1 3				1
4	"	"	LAS	ABQ		2283	BD	1/1	1 4				1
7	"	"	ABQ	ASE		2284	BD	1/1	1 1				1
7	"	"	ASG	BFI		2285	BD	1/1	2 2				2
							Page Total	16/11	58 4				58
							Amount Forward	6998 6581	11086 0	33	180 6	2176 8	890
							Total to Date	7009 6592	11144 4	33	180 6	2176 8	896

I certify that the statements made by me on this form are true.

Pilot's Signature David Rodgers

CONFIDENTIAL DR 000107

EXHIBIT 42
(Filed Under Seal)


FBI
31E-MM-108062
maxell
CD-R
80min 700MB
Photos from
Virginia Roberts

scan
scan0001
scan0003
scan0004
scan0005
scan0006
scan0007
scan0008
scan0009
scan0010
scan0011
scan0012
scan0013
scan0014
scan0015
scan0016
scan0017
scan0018
scan0019






































NEW YORK

EXHIBIT 43
(Filed Under Seal)

...าน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
Chiang Mai

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
062	4	923	№ 32098

DETAILS	AMOUNTS
Food 320 00 VAT 22.64 Service 32.00 Total 376 64	5 ROOM-B/F TBL 923/1 CHK 2098 GST 4 09OCT'02 06:11AM 4 COFE/TEA/MILK 320.00 T FOOD TOTAL 320.00 VAT 7% 24.64 SERVICE 32.00 TOTAL DUE 376.64 923 923/ROBERTS HOTEL GUEST 376.64 ACC RECIEVABLE 021009-02-00278 TIN 3 10 1 61770 2 RD# 5014 22 000232 -----5 CHECK CLOSED 06:13AM-----

'02 ตค -9 3 24

PAID-CHARGES

NAME :- Virginia Roberts ROOM NO. 923

e.c. NO.

ADDRESS :-

SIGNATURE [signature]

112 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
062	1	923	№ 32106

DETAILS	AMOUNTS
Food 110.00 VAT 8.47 SERVICE 11.00 TOTAL 129.47	5 ROOM-B/F

TBL 923/1 CHK 2106 GST 1
10OCT'02 06:24AM

1 FRENCH FRIES 110.00 T
FOOD TOTAL 110.00
VAT 7% 8.47
SERVICE 11.00
TOTAL DUE 129.47

923
923/ROBERTS
HOTEL GUEST 129.47
ACC RECIEVABLE 021010-02-00310
TIN 3 10 1 61770 2
RD# 5014 22 000232
-----5 CHECK CLOSED 06:25AM-----

PAID-CHARGES

NAME :- [signature]

ROOM NO. 923

C. C. NO.

ADDRESS :-

SIGNATURE [signature]

GIUFFRE007414
CONFIDENTIAL

ณ ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
064	1	# 923	№ 32117

DETAILS	AMOUNTS
Food @ 130 Sev. 10% 13 00 Vat. 7% 10.01 Tot 153.01	5 ROOM-B/F TBL 1/64 CHK 117 GST 1 13OCT'02 06:11AM 1 F RICE PORK CHIC 130.00 T FOOD TOTAL 130.00 VAT 7% 10.01 SERVICE 13.00 TOTAL DUE 153.01 923 923/ROBERTS HOTEL GUEST 153.01 ACC RECIEVABLE 021013-02-00435 TIN 3 10 1 61770 2 RD# 5014 22 000232 -----5 CHECK CLOSED 06:11AM-----

PAID-CHARGES

NAME :- Virginia Roberts ROOM NO. 923

C. C. NO.

ADDRESS :-

SIGNATURE

112 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
064	1	A 923	№ 32129

DETAILS	AMOUNTS
Food @ 250 Ser 10% 25.00 Vat 7% 19.25 Tot 294.25	5 ROOM-B/F TBL 1/69 CHK 129 GST 1 14OCT'02 06:08AM 1 FRIED SPRING ROL 120.00 T 1 F RICE PORK CHIC 130.00 T FOOD TOTAL 250.00 VAT 7% 19.25 SERVICE 25.00 TOTAL DUE 294.25 923 923/ROBERTS HOTEL GUEST 294.25 ACC RECIEVABLE 021014-02-00484 TIN 3 10 1 61770 2 RD# 5014 22 000232 -----5 CHECK CLOSED 06:08AM-----

PAID–CHARGES

NAME :– Virginia Roberts ROOM NO. 923

C. C. NO.

ADDRESS :–

SIGNATURE

GIUFFRE007416
CONFIDENTIAL

112 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

Swimming Pool

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
009	1	P15	№ 23621

DETAILS	AMOUNTS

13 POOL-PM

TBL 1/ CHK 621 GST 1
16OCT'02 03:23PM

1 WATER	25.00 T
BEVR. TOTAL	25.00
VAT 7%	1.93
SERVICE	2.50
TOTAL DUE	29.43

923
923/ROBERTS
HOTEL GUEST 29.43
ACC RECIEVABLE 021016-02-00630
TIN 3 10 1 61770 2
RD# 5014 22 000232
----13 CHECK CLOSED 03:30PM-----

PAID-CHARGES

NAME:– Virginia Roberts
ROOM NO.
C.C. NO. 923

ADDRESS:–

SIGNATURE

1/2 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
94	2	# 923	№ 32143

DETAILS	AMOUNTS
Food @ 240 Sev 10%. 24.00 vat 7%. 18.48 Tot. 282.48	5 ROOM-B/F TBL 923/1 CHK 143 GST 2 16OCT'02 06:19AM 2 FRIED SPRING ROL 240.00 T FOOD TOTAL 240.00 VAT 7% 18.48 SERVICE 24.00 TOTAL DUE 282.48 923 923/ROBERTS HOTEL GUEST 282.48 ACC RECIEVABLE 021016-02-00597 TIN 3 10 1 61770 2 RD# 5014 22 000232 -----5 CHECK CLOSED 06:20AM-----

PAID-CHARGES

NAME :- Virginia Roberts

ROOM NO. 923

ADDRESS :-

SIGNATURE [signature]

GIUFFRE007418
CONFIDENTIAL

112 ถ. ช้างคลาน ต. ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
cuf	3	923	№ 32147

DETAILS	AMOUNTS

5 ROOM-B/F

TBL 923/1 CHK 147 GST 3
16OCT'02 07:37AM

3 FAMILY BREAKFAST	780.00
FOOD TOTAL	780.00
VAT 7%	60.06
SERVICE	78.00
TOTAL DUE	918.06

923
923/ROBERTS
HOTEL GUEST 918.06
ACC RECIEVABLE 021016-02-00607
TIN 3 10 1 61770 2
RD# 5014 22 000232
-----5 CHECK CLOSED 08:00AM-----

PAID-CHARGES	
NAME :- Virginia Roberts	ROOM NO. 923
	C. C. NO.
ADDRESS :	
SIGNATURE	

112 ถ. ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
963	2	923	№ 32161

DETAILS	AMOUNTS
	5 ROOM-B/F

TBL 923/1 CHK 161 GST 2
17OCT'02 08:05AM

1 TOST/DNIS/CROSN 80.00 T
FOOD TOTAL 80.00
VAT 7% 6.16
SERVICE 8.00
TOTAL DUE 94.16

923
923/ROBERTS
HOTEL GUEST 94.16
ACC RECIEVABLE 021017-02-00673
TIN 3 10 1 61770 2
RD# 5014 22 000232
-----5 CHECK CLOSED 08:15AM-----

PAID-CHARGES

NAME :— Virginia Roberts ROOM NO. 923
C. C. NO.
ADDRESS :—
SIGNATURE Virginia Roberts

112 ม ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
963	1	923	№ 32162

DETAILS	AMOUNTS

ROOM-B/F

TBL 923/1 CHK 162 GST 0
17OCT'02 08:53AM

1 COFE/TEA/MILK 80.00 T
FOOD TOTAL 80.00
VAT 7% 5.16
SERVICE 8.00
TOTAL DUE 94.16

923
923/ROBERTS
HOTEL GUEST 94.16
ACC RECIEVABLE 021017-02-00679
TIN 3 10 1 61776 2
RD# 5014 22 000232
-----5 CHECK CLOSED 09:06AM-----

PAID CHARGES	
NAME :- Virginia Roberts	ROOM NO. 923
	C.C. NO. 923
ADDRESS :-	
SIGNATURE Virginia Roberts	

11. ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
063	2	923	№ 32160

DETAILS	AMOUNTS
	5 ROOM-B/F

TBL 923/1 CHK 2160 GST 2
17OCT'02 07:47am

1 FRESH FRUIT [illegible].00 T
2 OR GR TO JUICE 180.00 T
FOOD TOTAL [illegible].00
VAT 7% 20.02
SERVICE 26.00
TOTAL DUE 306.02

923
923/ROBERTS
HOTEL GUEST 306.02
ACC RECIEVABLE 0[illegible]17-02-00670
TIN [illegible] 10 1 61770 2
RD# 3014 22 0[illegible]232
-----5 CHECK CLOSED 10:02AM- ---

PAID-CHARGES

NAME :- Virginia Roberts

ROOM NO. 923

C. C. NO.

ADDRESS :-

SIGNATURE Virginia Roberts

112 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-8 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
692	2	923	№ 32171

DETAILS	AMOUNTS
	ROOM-B.F

923/1 CHK 171
18OCT'02 19:19PM

2 COFE/TEA/MILK	[illegible] T
1 MILK [illegible]	[illegible] T
FOOD TOTAL	250.00
VAT 7%	19.25
SERVICE	25.00
TOTAL DUE	294.25

922
923/ROBERTS
HOTEL GUEST 294.25
A/C RECIEVABLE U2018-02-00756
TIN 3 10 1 5177 1
5014 22 0 0232
-----5 CHECK CLOSED 08:52AM-----

PAID–CHARGES

NAME :– Robert Giuffre ROOM NO. 923

C. C. NO.

ADDRESS :–

SIGNATURE

GIUFFRE007423
CONFIDENTIAL

.คลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
Chiang Mai

ROOM SERVICE

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
042	2	923	№ 32172

DETAILS	AMOUNTS

```
ROOM-S
TBL 923/1     CHK 172
      18OCT'02 08:56PM

2 TOST/DNIS/APOSAN      [illegible]
  FOOD TOTAL            [illegible].30
  VAT 7%                 12.32
  SERVICE                16.[illegible]
  TOTAL DUE        188.32

  HOTEL GUEST           188.32
  RECIEVABLE      [illegible]018-02-00752
TIN       2 10 1 61770 2
PIN       5014 22 0 0232
-----CHECK CLOSED 09:04PM-----
```

PAID–CHARGES	
NAME :–	ROOM NO. 923
	C. C. NO.
ADDRESS :–	
SIGNATURE	

112 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

Garden
CAFE'

ทะเบียนการค้าเลขที่ 60 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
K. 13	1	9	№ 263581

DETAILS	AMOUNTS

```
  C/S-B/F
TBL 9/4        CHK 531        GST 1
       18OCT'02 08:27AM
  C.B.F.                 200.00
  FOOD TOTAL             200.00
  VAT 7%                  15.40
  SERVICE                 20.00
  TOTAL DUE             235.40

  705

  HOTEL GUEST            235.40
ACC RECIEVABLE   021018-02-00755
TIN      3 10 1 61770 2
         5014 22 000232
-----1 CHECK CLOSED 08:50AM-----
```

PAID—CHARGES	
NAME :— DAG RANGNES	ROOM NO. 703
	C. C. NO.
ADDRESS :—	
SIGNATURE Dag Rangnes	

GIUFFRE007425
CONFIDENTIAL

112 ถ. ช้างคลาน ต.ช้างคลาน อ. เมือง จ. เชียงใหม่ 50100 โทร. (053) 281033-6 แฟกซ์ 281044

ROYAL PRINCESS
CHIANG MAI

Swimming Pool

ทะเบียนการค้าเลขที่ 50 14 2827

WAITER NO.	PERSONS	TABLE NO.	CHECK NO.
006	2	Pool	№ 23629

DETAILS	AMOUNTS

12 POOL-AM.

TBL 1/69 CHK 629 GST 2
17OCT'02 12:06PM

1 SINGHA BEER -S	110.00	T
1 SOFT DRINKS	50.00	T
BEVR. TOTAL	160.00	
VAT 7%	12.32	
SERVICE	16.00	
TOTAL DUE	188.32	

907
907/BROWNLIE-MCI
HOTEL GUEST 188.32
ACC RECIEVABLE 021017-02-00695
TIN 3 10 1 51770 2
RD# 5014 22 000232
----12 CHECK CLOSED 12:14PM----

PAID—CHARGES	
NAME :— M. MCINTYRE	ROOM NO. 907
	C. C. NO.
ADDRESS :—	
SIGNATURE M McIntyre	

GIUFFRE007426
CONFIDENTIAL

ซัก-รีด/LAUNDRY

เล่มที่ Bk. No. 034 เลขที่ No. 01699

จำนวนที่ท่านนับ Guest Count	จำนวนที่แผนกนับ Office Count	สุภาพบุรุษ GENTLEMEN		จำนวนเงิน Amount	จำนวนที่ท่านนับ Guest Count	จำนวนที่แผนกนับ Office Count	สุภาพสตรี LADIES		จำนวนเงิน Amount
	9	เสื้อแขนสั้น/Shirts-short sleeves	70	630			ชุดติดกัน/Dress	130	
		เสื้อแขนยาว/Shirt-long sleeves	80				เสื้อนอก/Jacket	100	
	2	เสื้อยืด/T.Shirt	60	120		1	เสื้อสตรี/Blouse	70	70
		กางเกงขายาว/Trousers	90				ชุดกางเกง/Pant Suit	120	
		ผ้าเช็ดหน้า/Handkerchief	20				กระโปรง/Skirt	100	
	5	ถุงเท้า 1 คู่/Socks PR.	25	125		5	กางเกงสตรี/Slack	90	450
	3	กางเกงขาสั้น/Shorts	60	180			ผ้าเช็ดหน้า/Handkerchief	20	
	3	เสื้อกล้าม/Undershirt	30	90			ชุดนอน/Pyjamas	90	
	1	กางเกงชั้นใน/Underpant	30	30			เสื้อคลุม/Gown & Robe	90	
		เสื้อกันหนาว/Coat (Cotton)	100				เสื้อชั้นใน/Brassieres	45	
		ชุดนอน/Pyjamas	90			12	กางเกงชั้นใน/Panty	40	480
		ชุดซาฟารี/Safari Suit	150				กระโปรงชั้นใน/Slip	60	
		อื่นๆ/Other					อื่นๆ/Other		

☒ บริการปกติ Regular Service
☐ บริการด่วน (เพิ่มค่าบริการ 50%) Express (50% Surcharge)
☐ ยังไม่ต้องส่งผ้า To Hold

เสื้อที่จะต้องส่งคืน Shirts to be returned
☒ พับ Folded
☐ แขวน Hanger

(Delicatley)

ยอดรวม Total Amount	1625
10% ค่าบริการ 10% Service Charge	162.50
7% ค่าภาษี 7% Government Tax	125.20
ยอดรวมทั้งสิ้น/TOTAL	1912.70

ชื่อ/Name Virginia Roberts
หมายเลขห้อง/Room No. 923 923 923
วันที่/Date 10.3.02 11/10/45
วันที่และเวลาที่ท่านคืนห้อง/Your Departure Date & Time

คำสั่งเพิ่มเติม/Special Instructions: Wash colors seperate - Be Delicate w/ lace jeans & underwear

Laundry Mark:

PINK = CASHIER, YELLOW = ACCOUNT, WHITE = GUEST

GIUFFRE007427
CONFIDENTIAL

บริษัทรอยัล ปริ๊นเซส จำกัด (มหาชน)
สาขาโรงแรมรอยัล ปริ๊นเซส เชียงใหม่
112 ถ.ช้างคลาน ต.ช้างคลาน
อ.เมือง จ.เชียงใหม่

เลขประจำตัวผู้เสียภาษี 3 10 161770 2

ROYAL PRINCESS
CHIANG MAI

MINI BAR LIST NO. 41607

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR Ccvn

NAME .... ROOM NO. 923 DATE 14-10-15

PAR STOCK	CONTENTS	UNIT PRICE	CONSUMP-TION	TOTAL BAHT
2	Singha Beer (Small)	100		
2	Heineken Beer	110		
2	Soda Water	50		
1	Coca-Cola	50	1	50
2	Mineral Water	60	2	120
1	Brandy V.S.O.P. 20 cl.	550		
1	Scotch Whisky 20 cl.	400		
1	Thai Whisky	130		
1	Gin 20 cl.	400		
1	Vodka 20 cl.	400		
4	Chocolate Bar	60	1	120
1	Potatoes Snack	40		
2	Singha Water	Complimentary		
Prices are inclusive of service charge and VAT		[signature]	TOTAL	290

We refill your refrigerator daily and bill the consumption directly to your Hotel account.
And drinks will be charged fully when the bottle is open.

PLEASE DO NOT PAY CASH

Guest's signature ....

Refilled by .... Front Office Cashier

บริษัทรอยัล ปริ๊นเซส จำกัด (มหาชน)
สาขาโรงแรมรอยัล ปริ๊นเซส เชียงใหม่
112 ถ.ช้างคลาน ต.ช้างคลาน
อ.เมือง จ.เชียงใหม่

เลขประจำตัวผู้เสียภาษี 3 10 161770 2

ROYAL PRINCESS
CHIANG MAI

MINI BAR LIST

NO. 41678

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR แขก

NAME .... ROOM NO. 923 DATE 9-10-45

PAR STOCK	CONTENTS	UNIT PRICE	CONSUMPTION	TOTAL BAHT
2	Singha Beer (Small)	100		
2	Heineken Beer	110		
2	Soda Water	50		
1	Coca-Cola	50		
2	Mineral Water	60	1	60
1	Brandy V.S.O.P. 20 cl.	550		
1	Scotch Whisky 20 cl.	400		
1	Thai Whisky	130		
1	Gin 20 cl.	400		
1	Vodka 20 cl.	400		
4	Chocolate Bar	60	1	60
1	Potatoes Snack	40		
2	Singha Water	Complimentary		
Prices are inclusive of service charge and VAT		97	TOTAL	120

We refill your refrigerator daily and bill the consumption directly to your Hotel account. And drinks will be charged fully when the bottle is open.

PLEASE DO NOT PAY CASH

Guest's signature ....

Refilled by .... Front Office Cashier

บริษัทรอยัล ปริ๊นเซส จำกัด (มหาชน)
สาขาโรงแรมรอยัล ปริ๊นเซส เชียงใหม่
112 ถ.ช้างคลาน ต.ช้างคลาน
อ.เมือง จ.เชียงใหม่

ROYAL PRINCESS
CHIANG MAI

เลขประจำตัวผู้เสียภาษี 3 10 161770 2

MINI BAR LIST

NO. 41854

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR

NAME .... ROOM NO. 923 DATE 16-10-45

PAR STOCK	CONTENTS	UNIT PRICE	CONSUMP-TION	TOTAL BAHT
2	Singha Beer (Small)	100		
2	Heineken Beer	110		
2	Soda Water	50		
1	Coca-Cola	50		
2	Mineral Water	60	1	60
1	Brandy V.S.O.P. 20 cl.	550		
1	Scotch Whisky 20 cl.	400		
1	Thai Whisky	130		
1	Gin 20 cl.	400		
1	Vodka 20 cl.	400		
4	Chocolate Bar	60	2	120
1	Potatoes Snack	40		
2	Singha Water	Complimentary		
Prices are inclusive of service charge and VAT			TOTAL	180

We refill your refrigerator daily and bill the consumption directly to your Hotel account.
And drinks will be charged fully when the bottle is open.

PLEASE DO NOT PAY CASH

Guest's signature ....

Refilled by .... Front Office Cashier

GIUFFRE007430
CONFIDENTIAL

บริษัทรอยัล ปริ๊นเซส จำกัด (มหาชน)
สาขาโรงแรมรอยัล ปริ๊นเซส เชียงใหม่
112 ถ.ช้างคลาน ต.ช้างคลาน
อ.เมือง จ.เชียงใหม่

เลขประจำตัวผู้เสียภาษี 3 10 161770 2

ROYAL PRINCESS
CHIANG MAI

MINI BAR LIST

NO. 41858

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR [illegible]

NAME .... ROOM NO. 923 DATE 15-10-45

PAR STOCK	CONTENTS	UNIT PRICE	CONSUMP-TION	TOTAL BAHT
2	Singha Beer (Small)	100		
2	Heineken Beer	110		
2	Soda Water	50		
1	Coca-Cola	50		
2	Mineral Water	60		
1	Brandy V.S.O.P. 20 cl.	550		
1	Scotch Whisky 20 cl.	400		
1	Thai Whisky	130		
1	Gin 20 cl.	400		
1	Vodka 20 cl.	400		
4	Chocolate Bar	60	2	120
1	Potatoes Snack	40		
2	Singha Water	Complimentary		

Prices are inclusive of service charge and VAT — TOTAL 120

We refill your refrigerator daily and bill the consumption directly to your Hotel account.
And drinks will be charged fully when the bottle is open.

PLEASE DO NOT PAY CASH

Guest's signature ....

Refilled by .... Front Office Cashier

บริษัทรอยัล ปริ๊นเซส จำกัด (มหาชน)
สาขาโรงแรมรอยัล ปริ๊นเซส เชียงใหม่
112 ถ.ช้างคลาน ต.ช้างคลาน
อ.เมือง จ.เชียงใหม่

เลขประจำตัวผู้เสียภาษี 3 10 161770 2

ROYAL PRINCESS
CHIANG MAI

MINI BAR LIST

NO. 41943

BEVERAGES AVAILABLE IN YOUR REFRIGERATOR [illegible]

NAME .... ROOM NO. 923 DATE 17-10-45

PAR STOCK	CONTENTS	UNIT PRICE	CONSUMP-TION	TOTAL BAHT
2	Singha Beer (Small)	100		
2	Heineken Beer	110	1	110
2	Soda Water	50		
1	Coca-Cola	50	1	50
2	Mineral Water	60		
1	Brandy V.S.O.P. 20 cl.	550		
1	Scotch Whisky 20 cl.	400		
1	Thai Whisky	130		
1	Gin 20 cl.	400		
1	Vodka 20 cl.	400		
4	Chocolate Bar	60		
1	Potatoes Snack	40		
2	Singha Water	Complimentary		

Prices are inclusive of service charge and VAT [signature] TOTAL 160

We refill your refrigerator daily and bill the consumption directly to your Hotel account.
And drinks will be charged fully when the bottle is open.

PLEASE DO NOT PAY CASH

Guest's signature ....

Refilled by .... Front Office Cashier

GIUFFRE007432
CONFIDENTIAL

EXHIBIT 44
(Filed Under Seal)

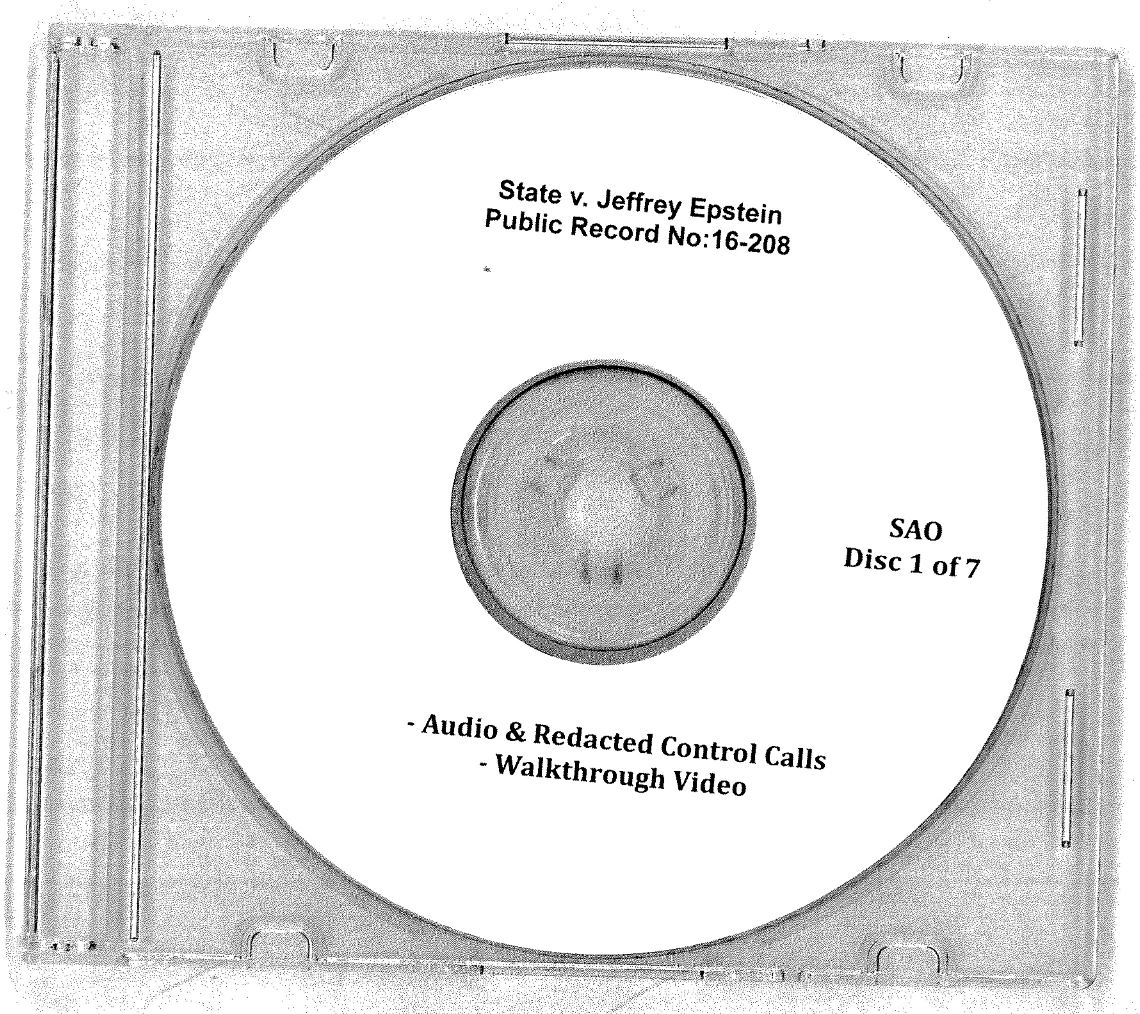

State v. Jeffrey Epstein
Public Record No:16-208
SAO
Disc 1 of 7
- Audio & Redacted Control Calls
- Walkthrough Video

EXHIBIT 45
(Filed Under Seal)

Changed

VEHICLES

Mercedes Benz 600 2001 Black Licence: EO3PRU Gone To NYC → Lic: U90-BQL '98	(561) 309-6415 Rear (561) 379-9390 ~~Front~~ Falcon by Dog	Mercedes Benz of Palm Beach 4000 Okeechobee Boulevard West Palm Beach, FL 33409 Att: Shawn Adison Tel: (561) 689-6363
Mercedes Benz 600 1997 Black Licence: G14KCT	(561) 758-1672 Rear (561) 818-8867 Front	
Mercedes Benz 600 Conv 1998 Silver Licence: RAS85L Gone	(561) 346-7141	Paint WORK & BODY SHOP COACH WORK contact Dominique [redacted]
Suburban 2001 Black Licence: WGE53R Gone to Zorro	(561) 371-1686	Roger Dean Chevrolet 2235 Okeechobee Boulevard West Palm Beach, FL 33409 Tel: (561) 683-8100
Crysler Mini Van 1996 White Licence: WGE52R Gone	(561) 308-5700	Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809
Cobra Grand 1993 Green C97CRJ Larry's Garage		Nestor Auto Repairs 2600 Florida Avenue West Palm Beach, FL 33401 Tel: (561) 835-0809
Volvo 1998 Gold Mrs Epstein	(561) 686-3707	Volvo Palm Beach 5544 Okeechobee Boulevard West Palm Beach, FL 33417 Tel: (561) 471-7600
Oil Well	900 Southern Boulevard West Palm Beach, FL 33405 **Tel: (561) 835-9374**	Oil change every 3 000 miles

Registration, insurance and yearly inspection papers to be kept in the glove compartment of each vehicle
Spare keys are kept in the key box in the office

Muvico Parisian	City Place 545 Hibiscus Street West Palm Beach, FL 33401 Tel: (561) 833-0400	

GROCERY STORES

Bishop Water Co	Tel: (561) 582-1367 Sharon	bottled water (large and small)
Carmine Giardini's	2401 PGA Boulevard, Suite 172 Palm Beach Gardens, FL 33410 Tel: (561) 775-0105 Fax (561) 775-9233	Fish, meat, gourmet foods
C'est Si Bon	280 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 659-6503	Gourmet foods
Publix Super Market	265 Sunset Avenue Palm Beach, FL 33480 Tel: (561) 655-4120	General, cleaning, toiletries
Wild Oats	7735 South Dixie Highway West Palm Beach, FL 33405 Tel: (561) 585-8800	Health Foods

HEALTH & BEAUTY

Pharmacy	Greens Pharmacy 151 North County Road Palm Beach, FL 33480 Tel: (561) 832-4443	
	Lewis Pharmacy 235 South County Road Palm Beach, FL 33480 Tel: (561) 655-7867	

UTILITIES

Water	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 **Tel: (561) 965-5770**	Water shut-off for entire property is located next to the mailbox on the sidewalk.
Electricity	Florida Power and Light General Mailing Facility Miami, FL 33188-0001 **Tel: (561) 697-8000**	
Gas	Florida Gas Company 401 South Dixie Highway West Palm Beach, FL 33401 **Tel: (561) 832-0872**	
Sewer	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 **Tel: (561) 965-5770**	
Trash Removal	City of West Palm Beach 226 Cypress Lane Palm Springs, FL 33461 **Tel: (561) 965-5770**- Water Dept (561) 965 4022 Trash Removal	Daily (Monday -Friday) Recycables (Thurs bef Noon)
Telephone	ETC 2921 N Australian Avenue West Palm Beach, FL 33407 **Tel: (561) 881-8118**	
	Bell South **Tel: (561) 780-2611**	

Plumber general PLumBing 561-585-2591	Foster Plumbing 2800 Westgate Avenue West Palm Beack, FL 33409 **Tel: (561) 686-1721**	General plumbing repairs
	Roto Rooter 6600 NW 12th Avenue, Suite 213 Fort Lauderdale, FL 33309 **Tel: (561) 832-1495**	Blocked drains
Pool	Hackl Pools 1331 Central Terrace Lake Worth, FL 33460 **Tel: (561) 588-7493** Valerie	Monday and Thursday at 10:30am Clean pool, filter, ad[REDACTED] (Michelle) [REDACTED]
Tree Trimming	County Wide Tree Service **Tel: (561) 371-5786**	First Monday in May and November

STORAGE

Storage USA	5580 Okeechobee Boulevard West Palm Beach, FL 33417 **Tel: (561) 683-9955**	10 ft x 20 ft unit available

VEHICLES

Car Detailing	~~Palm Beach Wash & Auto Detail 1220 N. Dixie Highway (at Amoco Gas) Tel: (561) 835-8748~~ James?	

george
Clean car services
[REDACTED]
724 SW 1st Ave
Boynton Beach Fl
33426

G. G.
724 SW 1st Av.
Boynton Beach, Fl
3

MAIL & DELIVERY SERVICES

FedEx	**1-800-463-3339**	Account No: [redacted] Drop-off box is next to Palm Beach National Bank on Worth Avenue
Post Office	401 South County Road West Palm Beach, FL **Tel: (561) 832-0697**	

MAINTENANCE

Air Conditioning	Cassidy Air Conditioning 501 Fern Street West Palm Beach, FL 33401 - Kathy **Tel: (561) 833-6331** - Kary	Monthly service contract First Monday of every month - Joe (Technician) Bob (Filter Service)
Awnings	American Awning Company 537 Pine Terrace West Palm Beach, FL 33405 **Tel: (561) 832-7123**	
Cable Service	Adelphia Cable 1401 North Point Parkway West Palm Beach, FL 33407 **Tel: (561) 478-8300**	
Carpenter	**Tel:** [redacted]	Erwin Roy
Carpet Cleaners	Stanley Steamers **Tel: (561) 586-5700**	Wall to wall
	Merry Rugs **Tel: (561) 588-8588**	Loose rugs
Computers	~~Bloomberg 499 Park Avenue New York, NY 10022 Tel: (212) 318-2100~~	Palm Beach consultants: Chad Bonta Peter Kapopoulos **Tel:** [redacted] Changed

TRAVEL

Pilots	Larry Visoski ✓	[redacted]
	Dave Rodgers	[redacted]
	Larry Morrison	[redacted]
Mr Epstein's planes	Jet Aviation	**(561) 233-7241** Procedure for leaving cars at the airport: Leave car at Jet Aviation landing strip Leave the keys in the car Advise Jet Aviation Tail #909JE or Tail #908JE They will tag and pull car to plane upon arrival
Ms Maxwell's plane	Raytheon Changed to: Fly Options	**1-888-835-9782** Contract No: Air 4 970QS Tail # ...TA Always a Beech Jet or Hawker
Commercial Airlines	Air France	**1-800-237-2747**
	American	**1-800-433-7300**
	British Airways	**1-800-247-9297**
	Continental	**1-800-525-0280**
	Delta	**1-800-221-1212**
	South African Airways	**1-800-722-9675**
	United	**1-800-241-6522**
	US Air	**1-800-428-4322**

– Carlos Avila Handyman (561)

=> Colonial Bank / Worth Ave.
- Ben Lenn
- Leonor

BANKING

Household Banking Account	Palm Beach National Bank 125 Worth Avenue Palm Beach, FL 33480 **Tel: (561) 653-5594**	Account No: [redacted] Send to Eric Gany for reconciliation $1,000 Petty Cash Float

BICYCLES

Bicycles	Palm Beach Bicycle Trail Shop 223 Sunrise Avenue Palm Beach, FL 33480 **Tel: (561) 659-4583**	Mongoose Crossway 450 Raleigh Aluminium 300 Mercedes Benz Cignal Sports Bike Schwinn World Huffy Santa Fe Raleigh Sport Scott Boston

BOOKSTORES

Newspapers	Publix Super Market 265 Sunset Avenue Palm Beach, FL 33480 **Tel: (561) 655-4120**	
Magazines	Main Street News 255 Royal Poinciana Way Palm Beach, FL 33480 **Tel: (561) 833-4027**	

CLEANING SERVICE

Francis Peadon **House Cleaning Services**	[redacted] cell 1. " 2.	Every Tuesday and Wednesday 8:00am - 4:00pm (Francis and Pastora Peadon)

[redacted]INMENT

The Breakers	One South County Road Palm Beach, FL 33480 **Tel: (561) 655-6611**	Renew car park stickers every September
Comedy Corner	2000 South Dixie Highway West Palm Beach, FL 33401 **Tel: (561) 833-1812**	
The Mar-a-Lago Club	1100 South Ocean Boulevard Palm Beach, FL 33480 **Tel: (561) 832-2600**	

Sam Co. System (561) 715- 4832 Sam

Electrician	Energy Efficient Electric **Tel: (561) 655-7211**	Changed.
Exterminator	Palm Beach Exterminating **Tel: (561) 689-0808**	Contact is Ken First Monday of every month at 10:30am Also use for termite tent
Garden Service	Alan Stopek Efflorescence [REDACTED] Trace Wellington, FL 33414 [REDACTED]	
	Jerome Pierre [REDACTED]	Part-time help. Billed through Alan Stopek. In residence: Daily from 6.30am Not in residence: Mon - Fri from 2pm - 5pm Also maintains Mrs Epstein's property on Saturday mornings.
Garage Doors	The Doorsmith 4160 NW First Avenue Boca Raton, FL 33431 **Tel: (561) 391-7768**	
Gates	Reich Metal Fabricators / Tom **Tel: (561) 585-3173** John	Back door gate switch - above garage door controls. When open, round red light is on. Front door gate switch - in telephone outlet above the kitchen telephone
Irrigation	Dolphin Sprinkler Inc **Tel: (561) 844-8082** Janet	Alan Bontz
Landscape Spraying	Academy Services **Tel: (561) 478-4629**	Arrange through Alan Stopek
Locksmith	Wilson Rowan Locksmiths 625 South Dixie Highway West Palm Beach, FL 33401 **Tel: (561) 655-3637**	
Painter	[REDACTED]	Bill Changed

Suburbs (Sunrock)

Sarah

Mom's

1.-

2.-

3.

★ Adriana

Alan
★ Stopok

– Bolle

– Benjamin
(State Dept)

★ – Bruno

– Dave (Pilot)

– David (Cook)

Sarah

– E M ollico

★ – George Mecrtons A.

– Ghislaine

– Nadia

– Hellen

– Omar

– Jom Luc (Karon Models)

★ – Jorge Mzortons

PB staff

– Larry (Pilot)

P.B House

P.B Fax (

– Lonny (Electri

– Miguel

P.B (305)

Mike Recodi

Address / Telephone Sheet Serah's E Mail:

358 El Brillo Way, Palm Beach Fl, 33480

Name	Address	Telephone/Fax
Mr. Jeffrey Epstein (NYSG LLC) Office 457, Madison Avenue 4th Floor New York, NY 10021.	Email	) Leslie) Jenn (Scty)) Helen Fax
Ms. Ghislaine Maxwell	Email	
Accountants		
Eric Gany	Email	Deutche Bank)!!!
• EMAD HANNA (St. Rep.)	Email	
• Bella Klein-Accountants (Petty Cash Rep.)	Email	
Assistants		
Leslie Groff (JE Sec)	Email	
Cecelia		
Helan Kim	Email	
~~Michelle Campos~~	Email	
Jenn Doyle		
Property		
Keith Blumberg	Email	
Engineer		
Richard Barnett	(212) ...	
DOUG SCHOETTLE	Architech (212) 717.4672 F.	ot inService'
Computers		
Mark Lumberg		

E 71st / 1, N.Y. / 00

Residences of Mr. Jeffrey Epstein
9 East 71st Street,
New York NY 10021

Mr. Jeffrey Epstein

Ms. Ghislaine Maxwell

Staff
House Manager Jojo
House Manger Lynn

Staff Phone

Chef Brent Tindall

Home Depot 478-0783 Mon

Palm Beach Contractors

General Plumbing		
Customer Service representative	Amy	561 585 2591
Electrical		
Reel Power Inc	Lenny (electrician)	561 706 0827
Gates		
Samco Systems	Sam (owner)	561 719 4832
Service gate switch: above garage door controls, when round light is on		
Front gate switch: just above the telephone outlet kitchen area		
Garage doors		
The Door Smith Inc	Keith Kelly	
Telephones		
Southern Bell (repairs)		561 780 2355
Internal Phone system (NEC)		
Repair and Programming		561 881 8118
Alarm System		
Benham Industries Inc	Keith	854 491 4112
Locksmith		
Wilson & Rowan		561 655 3637
A/C Maintenance		
John C Cassidy	24 hr service	
Handyman		
Carlos (carpenter) Avila Pardo		
Landscape		
Alan Stopeck		
Pest Control		
Palm Beach Exterminator	Kim	561 844 8082
Irrigation		
Dolphin Sprinkle		561 478 4696
Pool Heating		
National Pool Service	When needed	561 585 8866
Pool Maintenance		
Hack Pool Service	Monday/ Thursday	561 588 7493
Tree Trimming		
Country Wide Trees	Twice, summer/winter	561 371 5786
Carpet Cleaners		
Stanley Steamers	wall to wall	561 586 5700
Merry Rug	area rug	561 588 8588

Alarm - 954.

POST OFFICE - 1.800.2758777
561.659.0261

ved 1
8-12

Cable
Adelphia cable | Cable TV | 561 ~~468 8300~~ 697.8473
1.888.683.1000

Bottled Water.
Bishop water company | Avion water | 561582 1367

Upholsterer
Frank Jennes | [redacted]

Gas
Gas Energy Inc (Joe Di Giovanni) all gas repairs) | 561 963 0505

Laundry equipment
May Tag | 1800 622 4729

Painter
Sam | Contact Lenny | [redacted]

Storage
Storage USA | 561 683 5835
5580, Okeechobee Blvd
Unit 6218

Grocery & General Household items

General Grocery
Publix
265, Sunset Ave | 561 655 4120

Gourmet food
C' est si bon
289, Sunset Blvd | 561 659 6503

Carmines
2401 PGA Blvd Take 95 North to PGA Blvd | 561 775 9233
Too Jays Gravelox/ Nova sliced salmon | 561 655 6545

Green Pharmacy
151., N County Road | 561 832 4443

Flowers
Extra touch Flowers | 561 835 8000

Hardware
Home Depot | 561 832 0783
Sewell Hardware | 561 832 7171
528, Clematis Street

Newspapers
Main Street News
255, Royal Poinciana Way | 561 833 4027

Post Office
401, South County Road, | 561 832 0697

Car Detailing George | [redacted]
Taxi Service/Limo Dan Tischen | [redacted]
FedEx # 114420816 (Monday & Thursday) | 1800 463 3339
Recycling Every Thursday 6AM to 5PM
Trash collection M-F once a day Early Morning

Cars
Mercedes of Palm Beach | 561 689 6393
Chevrolet | 561 683 8100
Auto Repairs Gray Sunoco 340 South County | 561 655 6645
Nestor Auto 2600, Florida Avenue | 561 835 0809
GasolineGray Sunoco

ALL AMERICAN SHUTTERS 561.712.9882

Marina [REDACTED]

* INTEL *

* From Sgt Dan Szarzewski
[REDACTED] w/F > [REDACTED]

Per Curtis

could talk w/ EPSTEIN KNOWS
Him WELL. INFO passed on to Capt.

-
- 12:50pm
- -wants to talk to you @ something private
- Friday
- 6/19 7:15pm
- 6/17 5:55 pm
- 12:30 has a Q For you - can you please call her
- 6/19 1020pm Jean Luc
- Signed Neiman Marcus 6/9/05 $ 33.02 Amex 01/06
- will be here @ 6:30 pm
- 6/19/05 1:00pm Jean Luc
- Four Season waitt
- 6/18/05 6:40
- 914
- 6/19/05
- TonyAWorld.com

Tranns

EXHIBIT 46
(Filed Under Seal)

SSA-1826 ITEMIZED STATEMENT OF EARNINGS

SOCIAL SECURITY ADMINISTRATION
EARNINGS RECORD INFORMATION

Date: 10/25/2016

Our records show the amount of earnings reported, not the amount of Social Security taxes that were paid.

Wages were first covered under Social Security in 1937. Therefore, 1937 is the first year for which earnings may be shown on our records. Employers were required to report earnings semi-annually in 1937, and on a quarterly basis for the years from 1938 through 1977. Beginning with 1978, employers are required to report earnings annually.

Our records do not show the exact date of employment (month and day) because we do not need this information to figure Social Security benefits. Employers do not give us this information.

Each year, there is a maximum amount of earnings that is subject to Social Security taxes and is used to compute benefits. If a person earns more than this maximum amount, the earnings statement will usually show the maximum rather than the total earnings. Maximum benefits can be found on the SSA website.
http://www.ssa.gov/OACT/COLA/cbb.html

Beginning in 1951, self-employed persons could also receive Social Security credit for their work. The maximum amounts of self-employment earnings that are subject to Social Security taxes and are used to compute benefits can also be found on the SSA website.
http://www.ssa.gov/OACT/COLA/cbb.html

If you have any questions, you should call, write, or visit any Social Security office. If you visit or call, please bring this letter. It will help us answer questions. The toll free number to call is 1-800-772-1213 (for the deaf or hard of hearing, call our TTY number, 1-800-325-0778).

SSA-1826 ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN XXX-XX-[REDACTED] * * *

FROM: SOCIAL SECURITY ADMINISTRATION
OFFICE OF CENTRAL OPERATIONS
6100 WABASH AVENUE
BALTIMORE MARYLAND 21215

NUMBER HOLDER NAME: VIRGINIA GIUFFRE
YEARS REQUESTED: 1998 THRU 2002; 2013 THRU 2015

BOIES SCHILLER AND FLEXNER
401 E LAS OLAS BLVD STE 1200
FORT LAUDERDALE FL 33301

*0302Q7P7V000026*XOTAFP.X3.EMI1826.AFP.R161024.PAM 000000000 00260106356962186551393501221100

EMPLOYER NUMBER: [REDACTED]
KFC USA INC
% PAYROLL DEPT
5200 COMMERCE CROSSING DR
LOUISVILLE KY 40229-2182

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					$140.70

EMPLOYER NUMBER: [REDACTED]
PUBLIX SUPER MARKETS INC
PO BOX 32018
LAKELAND FL 33802-2018

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					$216.69

EMPLOYER NUMBER: [REDACTED]
ASCENSION CHILD CARE CENTER
ASCENSION PEACE CHILD CARE CENTER
2701 N STATE ROAD 7
LAUD LAKES FL 33313-2731

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
1999					$216.97

SSA-1826 ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
AVICULTURAL BREEDING & RESEARCH
CENTER
% ERNEST LAKS
14201 125TH AVE N
WEST PALM BCH FL 33418-7945

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$99.48

EMPLOYER NUMBER: [REDACTED]
SOUTHEAST EMPLOYEE MANAGEMENT
COMPANY
2559 PALM DEER DR
LOXAHATCHEE FL 33470-2563

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$3,212.44

EMPLOYER NUMBER: [REDACTED]
MAR-A-LAGO CLUB LLC
TRUMP DONALD J GEN PTR
% TRUMP ORGANIZATION
1100 S OCEAN BLVD
PALM BEACH FL 33480-5004

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$1,866.50

EMPLOYER NUMBER: [REDACTED]
OASIS OUTSOURCING VI INC
2054 VISTA PKWY STE 300
WEST PALM BCH FL 33411-6742

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$2,037.60

EMPLOYER NUMBER: [REDACTED]
NEIMAN-MARCUS GROUP LLC
% NEIMAN MARCUS GROUP LTD SOLE MBR
1201 ELM ST
DALLAS TX 75270-2102

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2000					$1,440.79

SSA-1826 ITEMIZED STATEMENT OF EARNINGS
* * * FOR SSN [REDACTED] * * *

EMPLOYER NUMBER: [REDACTED]
MANNINOS INC
MANNINOS RESTAURANT
12793 B W FOREST HILL BLVD
WEST PALM BEACH FL 33414-4749

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2001					$212.00

EMPLOYER NUMBER: [REDACTED]
CCI OF ROYAL PALM INC
% ROBERT FURR TTEE
2255 GLADES RD STE 337-W
BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$403.64

EMPLOYER NUMBER: [REDACTED]
ROADHOUSE GRILL INC
ROBERT C FURR TTEE IN BANKRUPTCY
2255 GLADES RD STE 337W
BOCA RATON FL 33431-7379

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$1,247.90

EMPLOYER NUMBER: [REDACTED]
MARC PINKWASSER DVM PA
13860 WELLINGTON TRCE STE 31
WELLINGTON FL 33414-8541

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2002					$1,561.75

EMPLOYER NUMBER: [REDACTED]
GREAT OUTDOORS PREMIER RV-GOLF
RESORT COMMUNITY SVC ASSOC INC
145 PLANTATION DR
TITUSVILLE FL 32780-2528

YEAR	1ST QTR	2ND QTR	3RD QTR	4TH QTR	TOTAL
2014					$171.83

EXHIBIT 47
(Filed Under Seal)

Monday, November 7, 2016
1Quicken Data - All Accounts

QuickReport by Description

8/12/69 through 1/29/03

Date	Account	Num	Payee	Memo	Category	Clr
4/22/02	Courtyard Animal Hospital	1500	Virginia Roberts		*split*	R
5/6/02	Courtyard Animal Hospital	1522	VOIDvirginia Roberts			R
5/6/02	Courtyard Animal Hospital	1523	Virginia Roberts		*split*	R
5/20/02	Courtyard Animal Hospital	1541	Virginia Roberts		*split*	R
6/4/02	Courtyard Animal Hospital	1555	Virginia Roberts		*split*	R

Total 8/12/69 - 1/29/03

Total Inflows
Total Outflows

Net Total

EXHIBIT 48
(Filed Under Seal)

---------- Forwarded message ----------
From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:29
Subject: Re: URGENT - this is the statement
To: G Max <gmax1@ellmax.com>
Cc: Philip Barden <philip.barden@devonshires.co.uk>

OK G going with this, thanks Philip.
Sent from my BlackBerry® wireless device

From: [REDACTED]
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow<ross@acuityreputation.com>
Cc: Philip Barden<philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

Jane Doe 3 is Virginia Roberts so not a new individual.

The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue.

The original allegations are not new and have been fully responded to and shown to be untrue

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschwitz is involved in having sexual relations with her, which he denies

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

EXHIBIT
tabbies
9

EXHIBIT 49
(Filed Under Seal)

TERMINATIONS

LAST NAME	FIRST NAME	
Rinker	Ross	Box #7
Rivera	Pablo	Box #3
Rivera	Eduardo	Box #2
Rivero	Alicia	Box #7
Robbins	Jody	Box #4
Roberts	Virginia	Box #4
Roberts	Walter	Box #4
Roberts	Diane	Box #3
Robsham	Lydie	Box #7
Rodriguez	Francisco	Box #4
Rodriguez	Abel	Box #3
Rodriguez	Kenia	Box #3
Rodriguez	Aristalia	Box #2
Rogers	Howard	Box #2
Romeus	Melege	Box #2
Rony	Jean	Box #2
Roqueta	Maria	Box #2
Rose	Cheryl	Box #2
Rosenberg	Bradley	Box #2
Rosier	Sandra	Box #2
Rotchford	Bernadette	Box #4
Rubio	Pascual	Box #2
Rueda	Maria	Box #4
Ruiz	Juan	Box #2
Russeau	Heidi	Box #4
Russell	Kathryn	Box #4
Russotto	Vincent	Box #7
Ryan	Megan	Box #2
Ryan	Michael	Box #7
Saint Gerard	Manes	Box #7
Saint Surin	Jacquest	Box #2
Salloum	Adib	Box #2
Salman	David	Box #2
Salvador	Marian	Box #2
Sanford	Kevin	Box #5
Santos	Elimos	Box #2
Sasaki	Shoko	Box #7
Saunders	Sarah	Box #2
Savage	Angelia	Box #5
Savoie	Terry	Box #2
Scanlan	Peter	Box #5
Schlechter	Melissa	Box #5
Schmantowsky	Craig	Box #2
Schoonover	Richard	Box #2
Schroeder	Glenn	Box #5
Schumacher	Patricia	Box #2
Schwab	Emily	Box #2
Scotland	Jaycen	Box #7
Scott	Cecelia	Box #2

TERMINATIONS

LAST NAME	FIRST NAME	
Vasquez	Sosmar	Box #5
Vasquez	Christian	Box #2
Vaughn	Matthew	Box #2
Velasquez	Rodollfo	Box #2
Vidalis	Chantal	Box #2
Voluck	Justin	Box #2
Vyskrebentsev	Aleksey	Box #5
Wahl	Steven	Box #5
Walker	Sylvia	Box #7
Walkowiak	Toni	Box #7
Wallace	Philip	Box #2
Ward	Terry	Box #5
Webb	Jacob	Box #7
Weber	Ronald	Box #2
Weidner	James	Box #7
Weisman	Brian	Box #2
Wentworth	Gayle	Box #2
Weslowski	Elaine	Box #2
White	Scott	Box #5
Whitley	Deborah	Box #7
Whitney	Moriah	Box #7
Whittle	Tamara	Box #2
Wilburn	Jennifer	Box #2
Williams	Arhon	Box #2
Williams	Gretchen	Box #2
Williams	Jacqueline	Box #2
Williams	Ellen	Box #7
Williams	Kristin	Box #7
Willoughby	William	Box #2
Willson	Howard	Box #5
Willson	Joseph	Box #2
Woolf	Elena	Box #2
Wynn	Beverly	Box #2
Yancey	Kathryn	Box #2
Yancey	Scott	Box #7
Yeskey	Dean Martin	Box #5
Young	Todd	Box #2
Zervoulis	Matthew	Box #2
Zivkovic	Milo	Box #2
Zorn	Christopher	Box #7
Zwick	Danielle	Box #2

Box #1	1998 terms
Box #2	1998 & 1999 terms
Box #3	1999 terms
Box #4	2000 terms
Box #5	2000 terms
Box #6	2001 terms

EXHIBIT 50
(Filed Under Seal)

EXHIBIT12

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

Case No. 08-80736-Civ-Marra/Johnson

JANE DOE #1 and JANE DOE #2

v.

UNITED STATES
______________________________/

JANE DOE #3 AND JANE DOE #4's CORRECTED MOTION PURSUANT TO RULE 21 FOR JOINDER IN ACTION

COME NOW Jane Doe #3 and Jane Doe #4 (also referred to as "the new victims"), by and through undersigned counsel, to file this motion pursuant to Federal Rule of Civil Procedure 21 to join this action, on the condition that they not re-litigate any issues already litigated by Jane Doe #1 and Jane Doe #2 (also referred to as "the current victims"). The new victims have suffered the same violations of their rights under the Crime Victims' Rights Act (CVRA) as the current victims. Accordingly, they desire to join in this action to vindicate their rights as well. Because the new victims will not re-litigate any issues previously litigated by the current victims (and because they are represented by the same legal counsel as the current victims), the Government will not be prejudiced if the Court grants the motion. The Court may "at any time" add new parties to the action, Fed. R. Civ. P. 21. Accordingly, the Court should grant the motion.[1]

FACTUAL BACKGROUND

[1] As minor victims of sexual offenses, Jane Doe #3 and Jane Doe #4 desire to proceed by way of pseudonym for the same reasons that Jane Doe #1 and Jane Doe #2 proceeded in this fashion. Counsel for the new victims have made their true identities known to the Government.

As the Court is aware, more than six years ago, Jane Doe #1 filed the present action against the Government, alleging a violation of her rights under the CVRA, 18 U.S.C. § 3771. DE1. She alleged that Jeffrey Epstein had sexually abused her and that the United States had entered into a secret non-prosecution agreement (NPA) regarding those crimes in violation of her rights. At the first court hearing on the case, the Court allowed Jane Doe #2 to also join the action. Both Jane Doe #1 and Jane Doe #2 specifically argued that the government had failed to protect their CVRA rights (inter alia) to confer, to reasonable notice, and to be treated with fairness. In response, the Government argued that the CVRA rights did not apply to Jane Doe #1 and Jane Doe #2 because no federal charges had ever been filed against Jeffrey Epstein.

The Court has firmly rejected the United States' position. In a detailed ruling, the Court concluded that the CVRA extended rights to Jane Doe #1 and Jane Doe #2 even though federal charges were never filed. DE 189. The Court explained that because the NPA barred prosecution of crimes committed against them by Epstein, they had "standing" to assert violations of the CVRA rights. *Id.* The Court deferred ruling on whether the two victims would be entitled to relief, pending development of a fuller evidentiary record. *Id.*

Two other victims, who are in many respects similarly situated to the current victims, now wish to join this action. The new victims joining at this stage will not cause any delay and their joinder in this case is the most expeditious manner in which to pursue their rights. Because the background regarding their abuse is relevant to the Court's assessment of whether to allow them to join, their circumstances are recounted here briefly.

<u>Jane Doe #3's Circumstances</u>

As with Jane Doe #1 and Jane Doe #2, Jane Doe #3 was repeatedly sexually abused by Epstein.

The Government was well aware of Jane Doe #3 when it was negotiating the NPA, as it listed her as a victim in the attachment to the NPA. Moreover, even a rudimentary investigation of Jane Doe #3's relationship to Epstein would have revealed the fact that she had been trafficked throughout the United States and internationally for sexual purposes. Nonetheless, the Government secretly negotiated a non-prosecution agreement with Epstein precluding any Federal prosecution in the Southern District of Florida of Epstein and his co-conspirators. As with Jane Doe #1, and Jane Doe #2, the Government concealed the non-prosecution agreement from Jane Doe #3 – all in violation of her rights under the CVRA – to avoid Jane Doe #3 from raising powerful objections to the NPA that would have shed tremendous public light on Epstein

and other powerful individuals and that would likely have been prevented it from being concluded in the secretive manner in which it was.

Jane Doe #4's Circumstances

If permitted to join this action, Jane Doe #4 would allege, and could prove at trial, that she has CVRA claims similar to those advanced by Jane Doe #1 and Jane Doe #2, based on the following:

As with the other Jane Does, Jane Doe #4 was repeatedly sexually abused by Epstein. In or around the summer of 2002, Jane Doe #4, an economically poor and vulnerable sixteen-year-old child, was told by another one of Epstein's underage minor sex abuse victims, that she could make $300 cash by giving an old man a massage on Palm Beach. An acquaintance of Jane Doe #4 (also a minor sexual abuse victim of Epstein) telephoned Epstein and scheduled Jane Doe #4 to go to Epstein's house to give him a massage. During that call, Epstein himself got on the phone (a means of interstate communication) with Jane Doe #4, asking her personally to come to his mansion in Palm Beach.

Jane Doe #4 then went to Epstein's mansion and was escorted upstairs to Epstein's large bathroom by one of Epstein's assistants. Shortly thereafter Jeffrey Epstein emerged and lay face down on the table and told Jane Doe #4 to start massaging him. Epstein asked Jane Doe #3 her age and she told him she had recently turned sixteen. Epstein subsequently committed illegal sexual acts against Jane Doe #4 on many occasions.

Epstein used a means of interstate communication (i.e., a cell phone) to arrange for these sexual encounters. Epstein also frequently travelled in interstate commerce (i.e., on his personal jet) for purposes of illegally sexually abusing Jane Doe #4.

The acts Epstein committed against Jane Doe #4, constituted numerous federal sex offenses, some of which do not carry a statute of limitations and thus are not time-barred. *See* 18 U.S.C. § 3283. And these offenses were the kinds of offenses that the Federal Bureau of Investigation (FBI) and U.S. Attorney's Office for the Southern District of Florida were pursuing in 2007. So far as Jane Doe #4 is aware, the U.S. Attorney's Office made no serious effort to locate her. Instead, after identifying approximately forty separate underage sexually abused victims, and apparently preparing a 53-page federal indictment and with full awareness of the existence of many victims like Jane Doe #4 – unidentified and not interviewed – it entered into a non-prosecution agreement barring prosecution of Epstein's federal crimes against these victims. This is contrary to the Government's normal approach in prosecuting federal sex offenses. It also violated Jane Doe #4's rights under the CVRA, including the fact that she had a "reasonable" right to confer with the U.S. Attorney's Office before they entered into an agreement with a sex offender barring prosecution of him for the crimes he committed against her. 18 U.S.C. § 3771(a)(5).

MOTION FOR JOINDER

Jane Doe #3 and Jane Doe #4 now both move to join this action filed by Jane Doe #1 and Jane Doe #2, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Rule 21 provides that "[o]n motion or on its own, the court may at any time, on just terms, add . . . a party." Rule 21 "grants the court broad discretion to permit a change in the parties at any stage of a litigation." *Ford v. Air Line Pilots Ass'n Int'l*, 268 F. Supp. 2d 271, 295 (E.D.N.Y. 2003) (internal quotation omitted). The new victims should be allowed to join the current victims in this action under Rule 21.

The new victims will establish at trial that the Government violated their CVRA rights in the same way as it violated the rights of the other victims. The new victims' participation in this case is important because it appears that the Government intends to raise a factual defense that somehow it did keep Jane Doe #1 and Jane Doe #2 properly informed of what was happening in the criminal prosecution. Of course, if four victims all testify consistently that they were not properly informed by the Government (as we believe they will), that provides a stronger case for a CVRA violation.

In addition, Jane Doe #3 and Jane Doe #4's participation is relevant to a defense the Court has allowed the Government to raise. The Court has previously ruled that the victims' request for rescission of the NPA "implicates a fact-sensitive equitable defense which must be considered in the historical factual context of the entire interface between Epstein, the relevant prosecutorial authorities and the federal offense victims – including an assessment of the allegation of a deliberate conspiracy between Epstein and federal prosecutors to keep the victims in the dark on the pendency of negotiations between Epstein and federal authorities until well after the fact and presentation of the non-prosecution agreement to them as *a fait accompli*." DE 189 at 12 n.6 (emphasis added). Jane Doe #3's and Jane Doe #4's participation in this case will help to show what the "entire interface" was between the Government and the victims and thus to respond to the Government's estoppel arguments as well as other defenses that it appears to be preparing to raise. *See, e.g.*, DE 62 (52-page response from the Government to the victim's summary judgment motion, raising numerous factually-based and other arguments against the victim's position).

Jane Doe #3's and Jane Doe #4's participation is also directly relevant to the discovery disputes currently pending in this case. The Government has raised various relevancy objections to the documents that Jane Doe #1 and Jane Doe #2 are attempting to obtain. The current victims have responded by explaining how these documents are relevant, including explaining how these documents might bear on the way in which Epstein used his powerful political and social connections to secure a favorable plea deal, as well as provide proof of the Government's motive to deliberately fail to investigate certain aspects of the victims' claims in an effort to maintain the secrecy of the facts and resolve the case without the victims' knowledge. *See, e.g.,* DE 266 at 6-10. Jane Doe #3 and Jane Doe #4's participation will help prove the relevancy of these requests, as well as the need for those requests.

One clear example is Request for Production No. 8, which seeks documents regarding Epstein's lobbying efforts to persuade the Government to give him a more favorable plea arrangement and/or non-prosecution agreement, including efforts on his behalf by Prince Andrew and former Harvard Law Professor Alan Dershowitz. Jane Doe #1 and Jane Doe #2 have alleged these materials are needed to prove their allegations that, after Epstein signed the non-prosecution agreement, his performance was delayed while he used his significant social and political connections to lobby the Justice Department to obtain a more favorable plea deal. *See, e.g.*, DE 225 at 7-8 (discussing DE 48 at 16-18). Jane Doe #3 has directly person knowledge of Epstein's connection with some of these powerful people and thus how Epstein might have used them to secure favorable treatment.

Adding two new victims to this case will not delay any of the proceedings. They will simply join in motions that the current victims were going to file in any event. For example, the

new victims will simply join in a single summary judgment motion that the current victims anticipate filing after discovery has been completed.

Nor will adding the new victims prejudice the United States. As the court is aware, this Court is still in its initial discovery stage. The Court is currently considering whether to reject the Government's assertion of privilege over documents regarding the case. *See* DE 265 (victims' reassertion of objections to the Government privilege claims). The new victims do not seek any additional discovery beyond that previously sought by the current victims.[2] Accordingly, the United States will not be prejudiced or burdened by adding them to this case.

The CVRA does not contain any statute of limitations for filing an action to enforce rights under the statute. Accordingly, were the Court to deny this motion, the result might be that the new victims would then be forced to file a separate suit raising their claims, which would then possibly proceed on a separate litigation track. Rather than require duplicative litigation, the Court should simply grant their motion to join.

Jane Doe #1 and Jane Doe #2 support the joinder motion. Counsel for the victims have discussed this motion with the Government at length in an effort to avoid any need to file a substantive pleading on the issue. Counsel for the victims asked the Government during the summer for its position on joinder. The Government, however, took the matter under advisement for months. Ultimately, after several inquiries from victims counsel, the Government indicated without explanation that it opposes this motion. Counsel for the victims has requested a meeting with the Government on this issue, which will hopefully occur in

[2] Jane Doe #3 and Jane Doe #4 have asked the Government to provide them with the record of their statements that they provided to the FBI. These FBI 302's should be only a few pages long.

January. In the meantime, however, counsel for the victims believe that it is no longer appropriate to delay filing this motion and accordingly file it at this time. Because the Government is apparently opposing this motion, Jane Doe #3 and Jane Doe #4 have described the circumstances surrounding their claims so that the Court has appropriate information to rule on the motion.

CONCLUSION

Jane Doe #3 and Jane Doe #4 should be allowed to join this action, pursuant to Rule 21 of the Federal Rules of Civil Procedure. Their joinder should be conditioned on the requirement that they not re-litigate any issues previously litigated by Jane Doe #1 and Jane Doe #2. A proposed order to that effect is attached to this pleading.

DATED: January 2, 2015

Respectfully Submitted,

/s/ Bradley J. Edwards
Bradley J. Edwards
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EDWARDS, FISTOS & LEHRMAN, P.L.
425 North Andrews Avenue, Suite 2
Fort Lauderdale, Florida 33301
Telephone (954) 524-2820
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And

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Attorneys for Jane Doe #1 and Jane Doe #2

* This daytime business address is provided for identification and correspondence purposes only and is not intended to imply institutional endorsement by the University of Utah

CERTIFICATE OF SERVICE

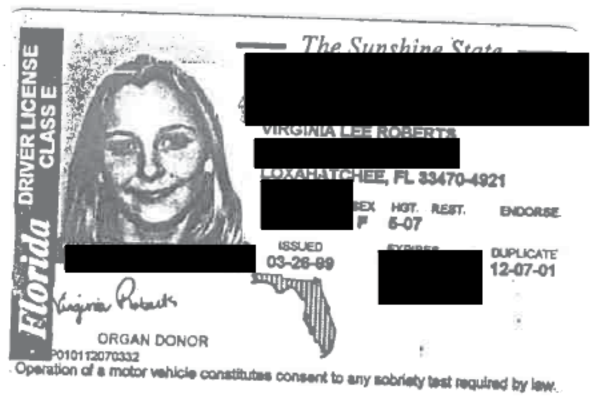
I certify that the foregoing document was served on January 2, 2015, on the following using the Court's CM/ECF system:

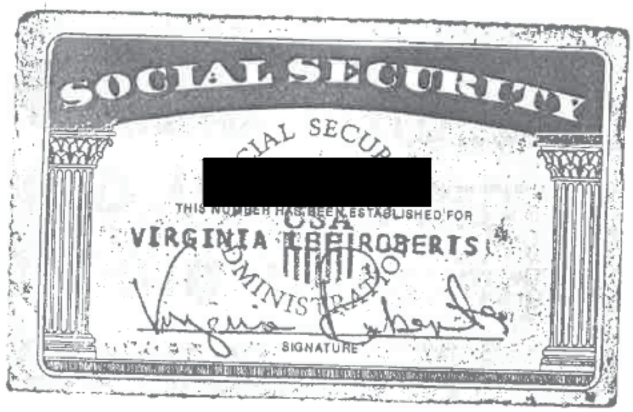
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Attorneys for the Government

/s/ Bradley J. Edwards

EXHIBIT 51
(Filed Under Seal)


Florida
DRIVER LICENSE
CLASS E
The Sunshine State
VIRGINIA LEE ROBERTS
LOXAHATCHEE, FL 33470-4921
SEX
HGT.
REST.
ENDORSE
F
5-07
ISSUED
03-26-99
DUPLICATE
12-07-01
ORGAN DONOR
P010112070332
Operation of a motor vehicle constitutes consent to any sobriety test required by law.


SOCIAL SECURITY
THIS NUMBER HAS BEEN ESTABLISHED FOR
VIRGINIA LEE ROBERTS
SIGNATURE

Selected docket entries for case 18−2868

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Filed	Document Description	Page	Docket Text
08/09/2019	284 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	2	UNSEALED SUMMARY JUDGMENT RECORD, appendix 10 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628244] [18−2868]
08/09/2019	285 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	40	UNSEALED SUMMARY JUDGMENT RECORD, appendix 11 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628246] [18−2868]
08/09/2019	286 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	44	UNSEALED SUMMARY JUDGMENT RECORD, appendix 12 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628248] [18−2868]
08/09/2019	287 UNSEALED SUMMARY JUDGMENT RECORD, DOCKETED	99	UNSEALED SUMMARY JUDGMENT RECORD, appendix 13 of 13 , pursuant to the Court's decision dated July 3, 2019, DOCKETED. [2628251] [18−2868]

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

15-cv-07433-RWS

Defendant's Reply to Plaintiff's Statement of Contested Facts and Plaintiff's "Undisputed Facts" Pursuant to Local Civil Rule 56.1

Laura A. Menninger
Jeffrey S. Pagliuca
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
303.831.7364

Pursuant to Rule 56.1 of the Local Civil Rules of this Court, defendant Ghislaine Maxwell submits this Reply to Plaintiff's Statement of Contested Facts and Plaintiff's Undisputed Facts ("Response"), Doc. 586-1.

INTRODUCTION

Plaintiff's Response fails under both the Federal Rules of Evidence and the Local Civil Rules of Procedure.

First, Plaintiff largely failed to provide any "citation to evidence which would be admissible" to challenge Defendant's Statement of Material Undisputed Facts and therefore Ms. Maxwell's undisputed facts should be deemed admitted.

Second, rather than set forth "additional material facts as to which it is contended that there exists *a genuine issue to be tried*" (Local Civil Rule 56.1(b)), Plaintiff instead set forth her own purportedly "undisputed facts." Because Plaintiff did not cross-move for summary judgment, her supposedly "undisputed facts" are not permitted by the Rules and should be stricken.

I. Ms. Maxwell's reply in support of statement of undisputed facts.

1. **Undisputed Fact 1:** In early 2011 plaintiff in two British tabloid interviews made numerous false and defamatory allegations against Ms. Maxwell. In the articles, plaintiff made no direct allegations that Ms. Maxwell was involved in any improper conduct with Jeffrey Epstein, who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, plaintiff suggested that Ms. Maxwell worked with Epstein and may have known about the crime for which he was convicted. Exs. A and B.

   a. **Reply**: Plaintiff cites no admissible evidence to contest these undisputed facts. McCawley Ex.34 (GIUFFRE368) is an email *from* Sharon Churcher to Plaintiff. It is Ms. Churcher's hearsay and therefore inadmissible. In any event, it does not speak to the

contents of Plaintiff's interviews with Churcher. McCawley Decl. Ex. 31 is an FBI interview, also inadmissible hearsay, which again does not describe Plaintiff's interviews in news articles. In the absence of contrary evidence, Undisputed Fact 1 should be deemed admitted.

2. **Undisputed Fact 2:** In the articles, plaintiff alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state." Exs. A-B at 5.

a. **Reply**: Plaintiff does not contest these facts and they therefore should be deemed admitted.

3. **Undisputed Fact 3:** In response to the allegations Ms. Maxwell's British attorney, working with Mr. Gow, issued a statement on March 9, 2011, denying "the various allegations about [Ms. Maxwell] that have appeared recently in the media. These allegations are all entirely false." Ex.C.

a. **Reply**: Plaintiff "denies" that Mr. Barden "issued a statement," but offers no admissible evidence to refute this point. Further, she acknowledges that the Statement was issued "By Devonshires Solicitors," Mr. Barden's law firm.

4. **Undisputed Fact 4:** The statement read in full:

> Statement on Behalf of Ghislaine Maxwell
>
> By Devonshires Solicitors, PRNE
> Wednesday, March 9, 2011
>
> London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*
>
> It is unacceptable that letters sent by Ms Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.
>
> In the circumstances, *Ms Maxwell is now proceeding to take legal action against those newspapers*.

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

Media contact:

Ross Gow
Acuity Reputation
Tel: +44-203-008-7790
Mob: +44-7778-755-251
Email: ross@acuityreputation.com

Media contact: Ross Gow, Acuity Reputation, Tel: +44-203-008-7790, Mob: +44-7778-755-251, Email: ross at acuityreputation.com

Ex.C.

a. **Reply:** Plaintiff does dispute the contents of the 2011 statement and therefore it should be deemed admitted.

5. **Undisputed Fact 5:** Plaintiff's gratuitous and "lurid" accusations in an unrelated action. In 2008 two alleged victims of Epstein brought an action under the Crime Victims' Rights Act against the United States government purporting to challenge Epstein's plea agreement. They alleged the government violated their CVRA rights by entering into the agreement. Ex.D, at 2.

a. **Reply**: Plaintiff "stipulates" to the facts contained in paragraph 5 and therefore they should be deemed admitted.

6. **Undisputed Fact 6:** Seven years later, on December 30, 2014, Ms. Giuffre moved to join the CVRA action, claiming she, too, had her CVRA rights violated by the government. On January 1, 2015, Ms. Giuffre filed a "corrected" joinder motion. Ex.D at 1, 9.

a. **Reply**: Plaintiff "agreed" to this paragraph.

7. **Undisputed Fact 7:** The issue presented in her joinder motion was narrow: whether she should be permitted to join the CVRA action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[] of Mr. Epstein and the Government owed them CVRA duties." Yet, "the bulk of the [motion] consists of copious factual details that [plaintiff] and [her co-movant] 'would prove . . . if allowed to join.'" Ms. Giuffre gratuitously included provocative and "lurid details" of her alleged sexual activities as an alleged victim of sexual trafficking. Ex.E, at 5.

a. **Reply**: Plaintiff does not dispute that Judge Marra made the findings detailed in Undisputed Fact 7. Further, she admits that the Government refused to stipulate that she "had been sexually abused by Jeffrey Epstein and his co-conspirators (including co-conspirator Alan Dershowitz), which would make her a 'victim' of a broad sex trafficking conspiracy." Although she now submits there were other reasons for inclusion of such lurid details, those reasons were rejected by Judge Marra. As she does not offer any admissible evidence to contradict the findings made by Judge Marra, this "fact," specifically Judge Marra's findings, should be deemed admitted. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of Judge Marra's ruling and order.

8. **Undisputed Fact 8:** At the time they filed the motion, Ms. Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA action. While they deliberately filed the motion without disclosing Ms. Giuffre's name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly. Ex.D, at 1 & n.1.

a. **Reply**: Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. Specifically, she does not offer any evidence to dispute that she knew the media had been following Epstein and the CVRA action, nor does she dispute that her attorneys made no attempt to file the motion under seal, rather filing it publicly. The facts are thus admitted.

9. Undisputed Fact 9: As the district court noted in ruling on the joinder motion, Ms. Giuffre "name[d] several individuals, and she offers details about the type of sex acts performed and where they took place." The court ruled that "these lurid details are unnecessary": "The factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . ., especially considering that these details involve *non-parties* who are not related to the respondent Government." Accordingly, "[t]hese unnecessary details shall be stricken." *Id.* The court then struck all Ms. Giuffre's factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. The court said the striking of the "lurid details" was a sanction for Ms. Giuffre's improper inclusion of them in the motion. Ex.E at 5-7.

a. Reply: Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. See Reply to Undisputed Fact 7, *supra*. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of Judge Marra's ruling and order.

10. **Undisputed Fact 10:** The district court found not only that the "lurid details" were unnecessary but also that the entire joinder motion was "entirely unnecessary." Ms. Giuffre and her lawyers knew the motion with all its "lurid details" was unnecessary because the motion

itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied plaintiff's joinder motion. *Id.* at 7-10.

a. Reply: Plaintiff offers no admissible evidence to refute these facts and they therefore should be deemed admitted. *See* Reply to Undisputed Fact 7, *supra*.

11. **Undisputed Fact 11:** One of the non-parties Ms. Giuffre "named" repeatedly in the joinder motion was Ms. Maxwell. According to the "lurid details" of Ms. Giuffre included in the motion, Ms. Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:

- Ms. Maxwell "approached" plaintiff in 1999 when plaintiff was "fifteen years old" to recruit her into the scheme.
- Ms. Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities."
- Ms. Maxwell was a "primary co-conspirator" with Epstein in his scheme.
- She "persuaded" plaintiff to go to Epstein's mansion "in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children."
- At the mansion, when plaintiff began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter."
- Epstein "with the assistance of" Ms. Maxwell "converted [plaintiff] into . . . a 'sex slave.'" *Id.* Plaintiff was a "sex slave" from "about 1999 through 2002."
- Ms. Maxwell also was a "co-conspirator in Epstein's sexual abuse."
- Ms. Maxwell "appreciated the immunity" she acquired under Epstein's plea agreement, because the immunity protected her from prosecution "for the crimes she committed in Florida."
- Ms. Maxwell "participat[ed] in the sexual abuse of [plaintiff] and others."
- Ms. Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [plaintiff]." *Id.* She shared the photos with Epstein.

- As part of her "role in Epstein's sexual abuse ring," Ms. Maxwell "connect[ed]" Epstein with "powerful individuals" so that Epstein could traffick plaintiff to these persons.
- Plaintiff was "forced to have sexual relations" with Prince Andrew in "[Ms. Maxwell's] apartment" in London. Ms. Maxwell "facilitated" plaintiff's sex with Prince Andrew "by acting as a 'madame' for Epstein."
- Ms. Maxwell "assist[ed] in internationally trafficking" plaintiff and "numerous other young girls for sexual purposes."
- Plaintiff was "forced" to watch Epstein, Ms. Maxwell and others "engage in illegal sexual acts with dozens of underage girls."

Id. at 3-6.

a. Reply: Plaintiff offers no admissible evidence to refute the facts actually stated in the paragraph, i.e., that the "lurid" details (as coined by Judge Marra) were included in her CVRA Joinder Motion. Plaintiff claims to offer "admissible evidence" to "corroborate the statements [she] made in the joinder motion." Setting aside for the moment that most of the cited documents are inadmissible hearsay, as addressed later, such evidence should be disregarded because none of the offered documents speak to fact that these "lurid" details were actually included in the joinder motion, as a simple reading of Ex.D reveals. Because Plaintiff does not refute that point, the fact that the details were in the Joinder Motion should be deemed admitted. In any event, we request under Fed. R. Evid. 201(c)(2) that the Court take judicial notice of the contents of plaintiff's CVRA joinder motion.

12. **Undisputed Fact 12:** In the joinder motion, plaintiff also alleged she was "forced" to have sex with Harvard law professor Alan Dershowitz, "model scout" Jean Luc Brunel, and "many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders." *Id.* at 4-6.

a. **Reply**: Again, Plaintiff offers no evidence that these "lurid details" were included in the Joinder Motion, as indeed they were, and thus the fact that they were should be deemed admitted.

13. **Undisputed Fact 13:** Plaintiff said after serving for four years as a "sex slave," she "managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years." *Id.*at 3

a. **Reply:** Plaintiff does not dispute that she made this statement in her joinder motion and it is admitted.

14. **Undisputed Fact 14:** Plaintiff suggested the government was part of Epstein's "conspiracy" when it "secretly" negotiated a non-prosecution agreement with Eptstein precluding federal prosecution of Epstein and his "co-conspirators." The government's secrecy, plaintiff alleged, was motivated by its fear that plaintiff would raise "powerful objections" to the agreement that would have "shed tremendous public light on Epstein and other powerful individuals. *Id.* at 6-7.

a. **Reply**: Plaintiff does not contest the quoted contents of the joinder motion, but rather offers argument regarding Plaintiff's purported "belief." Plaintiff did not submit an affidavit attesting to such "belief" and therefore no admissible evidence was cited or offered. The facts should therefore be deemed admitted.

15. **Undisputed Fact 15:** Notably, the other "Jane Doe" who joined plaintiff's motion who alleged she was sexually abused "many occasions" by Epstein was unable to corroborate any of plaintiff's allegations. *Id.* at 7-8.

a. **Reply**: Plaintiff states the facts are "untrue" but offers no admissible evidence to support that statement. She has no affidavit or other statement from "the other 'Jane

Doe' (who was represented by Plaintiff's counsel, and therefore had the ability to furnish such an affidavit). Indeed, Plaintiff acknowledges that the "other Jane Doe" "does not know Ms. Giuffre." These facts must be deemed admitted. [REDACTED], who is NOT the other Jane Doe, is irrelevant to the undisputed fact asserted. She also offers no corroboration of the 'same pattern of abuse,' and in fact does not "remember" any such facts, as already briefed. *See* Doc. 567 at 12-14.

16. **Undisputed Fact 16:** Also notably, in her multiple and lengthy consensual interviews with Ms. Churcher three years earlier, plaintiff told Ms. Churcher of virtually *none* of the details she described in the joinder motion. Exs. A-B.

a. **Reply**: Plaintiff's protestation aside, the Churcher articles (attached to Ms. Churcher's sworn affidavit filed in this case at Doc. 216 and 216-1 through 216-8) fail to include the vast majority of details included in Plaintiff's CVRA joinder motion, as any side-by-side comparison will reveal. Plaintiff's simple facile response is that she "did reveal details in 2011 consistent with those in the joinder motion." She offers no admissible evidence of these details she "revealed" to Ms. Churcher, instead citing to a heavily redacted interview she purportedly gave to *the FBI*, not Ms. Churcher. The purported FBI report is itself hearsay, not to mention, redacted and prepared years after any supposed interview of Plaintiff. McCawley Decl. Ex.31. Because Plaintiff offers no admissible evidence to contradict the discrepancies between the Churcher articles and the joinder motion, these facts should be deemed admitted.

17. **Undisputed Fact 17: Ms. Maxwell's response to plaintiff's "lurid" accusations: the January 2015 statement.** As plaintiff and her lawyers expected, before District Judge Marra in the CVRA action could strike the "lurid details" of plaintiff's allegations in the joinder

motion, members of the media obtained copies of the motion. Ex.G at 31:2-36:4 & Depo. Exs. 3-4.

a. **Reply**: Plaintiff cites no contrary evidence and therefore the facts should be deemed admitted.

18. **Undisputed Fact 18:** At Mr. Barden's direction, on January 2, 2015, Mr. Gow sent to numerous representatives of British media organizations an email containing "a quotable statement on behalf of Ms Maxwell." EX.F; EX.G, at 33:8-23. The email was sent to more than 6 and probably less than 30 media representatives. *See* Ex.G, at 33:8-34:3. It was not sent to non-media representatives. *See id.* at 31:2-35:21.

a. **Reply:** Plaintiff disputes as "blatant falsehood," without admissible evidence, that it was Mr. Barden who directed that the January 2 email be sent to media organizations. She then goes on to quote the very section of Mr. Gow's deposition in which he surmises (but does not know, indicated by his statement it was his "understanding") that it was something that had been sent to Maxwell by Barden. Indeed, Mr. Barden clears up this confusion in his Declaration, in which he unequivocally swore,

> 10. In liaison with Mr. Gow and my client, on January 2, 2015, I prepared a further statement denying the allegations, and I instructed Mr. Gow to transmit it via email to members of the British media who had made inquiry about plaintiff's allegations about Ms. Maxwell. Attached as Exhibit A1 is an email containing a true and correct copy of this statement. The statement was issued on my authority. Although it is possible others suggested or contributed content, I prepared the vast majority of the statement and ultimately approved and adopted all of the statement as my work.

Ex.K ¶ 10. Mr. Gow's surmise as to how the statement was "forwarded to him" and by whom does not controvert the sworn testimony of Mr. Barden himself. Again, without admissible evidence to the contrary, the facts must be deemed admitted.

With regard to the number of media representatives to whom he sent the email, Mr. Gow testified it was between 6 and 30. Ex.G at 33-34. His further testimony, offered by Plaintiff, that he spoke to "over 30 journalists" does not contradict that statement. Nowhere does Plaintiff offer testimony that he *read the statement* to over 30 journalists. Instead, Mr. Gow acknowledged it was "very possible" that he had "*ever* read[] the statement to press or media over the phone," *not* that he read it to "over 30 journalists." Plaintiff's selective cutting and pasting undercuts her so called evidence that the facts in Paragraph 18 are "false," and thus they ought be deemed admissible.

19. **Undisputed Fact 19:** Among the media representatives were Martin Robinson of the Daily Mail; P. Peachey of The Independent; Nick Sommerlad of The Mirror; David Brown of The Times; and Nick Always and Jo-Anne Pugh of the BBC; and David Mercer of the Press Association. These representatives were selected based on their request—after the joinder motion was filed—for a response from Ms. Maxwell to plaintiff's allegations in the motion. *See, e.g.*, Ex.G, at 30:23-35:21 & Depo.Ex.3.

a. **Reply**: While Plaintiff decries the second sentence as "false," her cited evidence contradicts her conclusion. Mr. Gow testified that "any time there was an incoming query it was either dealt with on the telephone by referring them back to the two statements…or someone would email them the statement. So no one was left unanswered." McCawley Decl., Ex.6 at 67. As his testimony makes clear, Mr. Gow sent

the statement to those journalists who made inquiry; he did not sent it to anyone who did not. Based on the admissible evidence, this fact remains undisputed.

20. **Undisputed Fact 20:** The email to the media members read:

> To Whom It May Concern,
> Please find attached a quotable statement on behalf of Ms Maxwell.
>
> No further communication will be provided by her on this matter.
> Thanks for your understanding.
> Best
> Ross
>
> Ross Gow
> ACUITY Reputation
>
> Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.
>
> Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.
>
> Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.
>
> Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Ex.F.

a. **Reply**: Plaintiff does not dispute the contents of the email and therefore it should be deemed admitted.

21. **Undisputed Fact 21:** Mr. Barden, who prepared the January 2015 statement, did not intend it as a traditional press release solely to disseminate information to the media. So he intentionally did not pass it through a public relations firm, such as Mr. Gow's firm, Acuity Reputation. Ex.K ¶¶ 10,15.

a. **Reply**: Plaintiff makes two responses. As to the first sentence, she asserts without evidentiary support that "the Court should not consider" the Barden Declaration. This argument is frivolous for the reasons given on pages 8, 11-12, 18-19 of the Reply Brief in Support of Motion for Summary Judgment. It is a Declaration provided by an attorney with knowledge of the facts, Mr. Barden, disclosed by Defendant in her Rule 26 witnesses, whom Plaintiff chose not to depose. As to the second sentence, Plaintiff offers two pieces of evidence which she argues dispute the facts in question; they do not. That Mr. Gow forwarded the statement, prepared by Mr. Barden, to the media is not disputed. Rather, as Mr. Barden asserted in his declaration, and Plaintiff failed to cite contradictory evidence, he was the one who prepared the vast majority of the statement and instructed Mr. Gow to transmit it via email to members of the British media. Ex.K ¶¶ 10. He likewise avers that he "did not intend the January 2015 statement as a traditional press release solely to disseminate information to the media [and] this is why I intentionally did not request that Mr. Gow or any other public relations specialist prepare or participate in preparing the statement." *Id.* at ¶ 15. Plaintiff fails to contradict Mr. Barden's sworn statement.

22. **Undisputed Fact 22:** The January 2015 statement served two purposes. First, Mr. Barden intended that it mitigate the harm to Ms. Maxwell's reputation from the press's republication of plaintiff's false allegations. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject plaintiff's allegations to inquiry and scrutiny. For example, he noted in the statement that plaintiff's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicised as news." *Id.* ¶ 11.

a. **Reply**: This paragraph, eliciting Mr. Barden's intent, is uncontroverted by Plaintiff. She fails to cite any contradictory admissible evidence, instead making legal arguments. Her arguments are not admissible evidence (e.g., "it is her statement and she directed that it be sent to the media and public," lacks any citation to record evidence). Plaintiff's list of evidence she contends "corroborates" Plaintiff's claims should be ignored as they do not pertain to Mr. Barden's purposes in drafting the January 2 statement.

23. **Undisputed Fact 23:** Second, Mr. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish plaintiff's allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that plaintiff's allegations were "defamatory." In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Ms. Maxwell considered the publication of plaintiff's obviously false allegations and the legal indefensibility of their own conduct. *Id.* ¶ 17.

a. **Reply**: Again, Plaintiff "disputes" Mr. Barden's intent without citation to record evidence. Plaintiff claims that Barden did not "note" anything in the statement, but the statement itself contains the phrase: "Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news*, as they are defamatory."*

Plaintiff's unsupported arguments should be ignored and these facts pertaining to Mr. Barden's intent deemed admitted.

24. **Undisputed Fact 24:** Consistent with those two purposes, Mr. Gow's emails prefaced the statement with the following language: "Please find attached a *quotable statement* on behalf of Ms Maxwell" (emphasis supplied). The statement was intended to be a single, one-

time-only, comprehensive response—quoted in full—to plaintiff's December 30, 2014, allegations that would give the media Ms. Maxwell's response. *Id.* ¶ 18. The purpose of the prefatory statement was to inform the media-recipients of this intent. *Id.*

a. **Reply:** Plaintiff again "disputes" any statement related to Mr. Barden's purpose or intent, but offers no evidence contradicting his purpose or intent. She simply points out that Ms. Maxwell retained Mr. Gow in early 2015, and that he works for a public relations firm, which is non-responsive to the fact at issue, i.e., Mr. Barden's intent with respect to language included in the statement. No one has contested that it was Mr. Gow who actually forwarded the statement to select members of the media who had requested a response. The fact set forth should be deemed admitted.

25. **Undisputed Fact 25: Plaintiff's activities to bring light to the rights of victims of sexual abuse.** Plaintiff has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

a. **Reply:** Plaintiff offers no evidence to dispute the facts cited and so they should be deemed admitted.

26. **Undisputed Fact 26:** Plaintiff created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse. Doc. 1 (Complaint), ¶¶ 24-25.

a. **Reply:** Plaintiff does not dispute this statement.

27. **Undisputed Fact 27:** The "goal" of Victims Refuse Silence "was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by

victims of sexual abuse." Toward this end, plaintiff has "dedicated her professional life to helping victims of sex trafficking." *Id.*

a. **Reply:** Plaintiff "agrees."

28. **Undisputed Fact 28:** Plaintiff repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse. This Reply Statement at ¶¶ 51-54 (citing *inter alia* Doc. 216 ¶¶ 2-11 and referenced exhibits, Doc. 261-1 to 216-8; Exs. N, KK, LL, MM).

a. **Reply:** Plaintiff "denies" this contention, points to an email from Sharon Churcher seeking to interview her, and asserts that it was the media that sought her out. The weight of evidence, cited by Defendant at paragraphs 51-54, in addition to Plaintiff's own documents, belie this assertion. She through her attorneys sought out a videotaped interview with ABC News, she sent her "book manuscript" to publishers and literary agents, and expressed anticipation and frustration that her "exclusive contract" with The Mail prevented her for a period of time from marketing her book. *See, e.g.,* EXHIBIT QQ at GIUFFRE003959.

To: sharon churcher[sharon.churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Fri 5/20/2011 2:20:09 AM
Importance: Normal
Subject: How ya doing??
Received: Fri 5/20/2011 2:20:09 AM

Hi Buddy,
I hope you are stopping to smell the daffodils once in a while and having a good day!! I am so excited today because I ca go sign with an agent as my contract is finished with "Mail On Sunday"...YEAH!! Sandra and I have been working really hard to get me ready for my trip to the U.S in a few weeks and I was wondering if I could use your advice again. She has got an INT'L agent who is interested in speaking with me and I don't want to say "Yes" to the first bite because I'm not su what to look for in an agent. What could you recommend that I do? I will send Jarred and Irene (your recommended agen a copy of the synopsis and sample chapters but how do I choose the right one for "The Story"? Do you know anyone else that might be interested in this as well? If so, i am keen on speaking with anyone who might be. I am soooooooo excited about this and will keep you updated with the progressing events. When I am in New York we have to meet up for some city shopping and take the kids to Central Park to see the Zoo, given there will be no masturbating kangaroo's for you to make friends with, but who know's? I am looking forward to showing Robbie around and he's got some family out there a well we have to catch up with. Such busy times, but I'm loving it!! Anyways I hope your taking care and catch me up on your fun times!!

Take care,
Jenna

Plaintiff has disputed none of these activities she freely engaged in for years, and thus these facts should be deemed admitted.

29. **Undisputed Fact 29:** On December 30, 2014, plaintiff publicly filed an "entirely unnecessary" joinder motion laden with "unnecessary," "lurid details" about being "sexually abused" as a "minor victim[]" by wealthy and famous men and being "trafficked" all around the world as a "sex slave." Ex.J ¶ 24; Ex.K ¶¶ 2-3.

a. **Reply:** Plaintiff argues that her "lurid details" were necessary legally. Judge Marra, however, has already held that they were not and her legal arguments, unsupported by any actual evidence in this case, cannot serve to controvert his findings as quoted.

30. **Undisputed Fact 30:** The plaintiff's alleged purpose in filing the joinder motion was to "vindicate" her rights under the CVRA, expose the government's "secretly negotiated" "non-prosecution agreement" with Epstein, "*shed tremendous public light*" on Epstein and "other powerful individuals" that would undermine the agreement, and support the CVRA plaintiffs' request for documents that would show how Epstein "used his powerful political and social connections to secure a favorable plea deal" and the government's "motive" to aid Epstein and his "co-conspirators." Ex.D, at 1, 6-7, 10 (emphasis supplied).

a. **Reply:** Plaintiff fails to offer any evidence to controvert the contents of her CVRA Joinder Motion and thus, the fact should be deemed admitted.

31. **Undisputed Fact 31:** Plaintiff has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein's alleged "sex scheme." Ex.KK.

a. **Reply:** Plaintiff directs the Court to her response to paragraph 52 and suggests the factual statement is misleading. She, however, offers no contradictory admissible evidence and thus the fact should be deemed admitted.

32. **Undisputed Fact 32: Republication alleged by plaintiff.** Plaintiff was required by Interrogatory No. 6 to identify any false statements attributed to Ms. Maxwell that were "'published globally, including within the Southern District of New York,'" as plaintiff alleged in Paragraph 9 of Count I of her complaint. In response, plaintiff identified the January 2015 statement and nine instances in which various news media published portions of the January 2015 statement in news articles or broadcast stories. Ex.H, at 7-8; Ex.I, at 4.

a. **Reply:** Her argument aside, Plaintiff offers no admissible evidence to controvert the interrogatory request and her response, which was limited to "nine instances" in which the press published "portions of the January 2015 statement." For example, Plaintiff does not point to a single news story that published the entirety of the January 2015 statement. In the absence of contrary evidence, the fact should be deemed admitted.

33. **Undisputed Fact 33:** In none of the nine instances was there any publication of the entire January 2015 statement. Ex.H, at 7-8; Ex.I, at 4.

a. **Reply:** Plaintiff does not and cannot point to any of the nine publications she disclosed, or any other publication, that published the entire January 2015 statement, and this fact thus must be deemed admitted.

34. **Undisputed Fact 34:** Ms. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in plaintiff's response to

Interrogatory No. 6, in connection with the media's publication of portions of the January 2015 statement. Ex.J ¶ 24; Ex.K ¶¶ 2-3.

a. **Reply:** Plaintiff's proffered evidence, testimony from Mr. Gow, fails to support her argument and fails to controvert the Barden Declaration as cited by the defendant. Nothing in the testimony establishes, as Plaintiff argues, that "Defendant hired Gow because his position allowed him to influence the press to publish her defamatory statement." The testimony is irrelevant to the factual point. The Gow testimony at most relates to why Ms. Maxwell engaged Mr. Gow. It does not bear on the factual point, i.e., that Ms. Maxwell, Mr. Gow or Mr. Barden did not exercise any control or authority over the media in the media's republication of portions of the statement. On this point plaintiff has failed to introduce any contrary evidence. Accordingly, the fact should be deemed admitted.

35. **Undisputed Fact 35: Plaintiff's defamation action against Ms. Maxwell.** Eight years after Epstein's guilty plea, plaintiff brought this action, repeating many of the allegations she made in her CVRA joinder motion. Doc. 1, ¶ 9.

a. **Reply:** Plaintiff "agrees."

36. **Undisputed Fact 36:** The complaint alleged that the January 2015 statement "contained the following deliberate falsehoods":

(a) That Giuffre's sworn allegations "against Ghislaine Maxwell are untrue."

(b) That the allegations have been "shown to be untrue."

(c) That Giuffre's "claims are obvious lies."

Doc. 1 ¶ 30 (boldface and underscoring omitted).

(a) **Reply:** Plaintiff "agreed."

37. **Undisputed Fact 37: Plaintiff lived independently from her parents with her fiancé long before meeting Epstein or Ms. Maxwell.** After leaving the Growing Together drug rehabilitation facility in 1999, plaintiff moved in with the family of a fellow patient. Ex.L at 7-8, 12-14. There she met, and became engaged to, her friend's brother, James Michael Austrich. *Id.* and at 19. She and Austrich thereafter rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. *Id.* at 11, 13-17. Later, they stayed briefly with plaintiff's parents in the Palm Beach/ Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. *Id.* at 17, 19, 25-27. Although plaintiff agreed to marry Austrich, she never had any intention of doing so. Ex.N at 127-128.

a. **Reply:** Plaintiff offers argument, without an affidavit or any other contradictory evidence, regarding whether Plaintiff "voluntarily live[d] independently" or whether a "reasonable person" could assert she was "engaged." Mr. Austrich and Plaintiff agreed that they were engaged and testified accordingly, as cited. In the absence of admissible evidence to the contrary, the facts as described by her fiancé in his deposition should be deemed admitted.

38. **Undisputed Fact 38: Plaintiff re-enrolled in high school from June 21, 2000 until March 7, 2002**. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, plaintiff re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. Ex.O. On September 20, 2001, Plaintiff then enrolled at Royal Palm Beach High School. *Id.* A few weeks later, on October 12, 2001, she matriculated at Survivors Charter School. *Id.* Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Ex.P at 23-24. Plaintiff

remained enrolled at Survivor's Charter School until March 7, 2002. Ex.O. She was present 56 days and absent 13 days during her time there. *Id.* Plaintiff never received her high school diploma or GED. Ex.Q at 475, 483. Plaintiff and Figueroa went "back to school" together at Survivor's Charter School. Ex.P at 23-27. The school day there lasted from morning until early afternoon. *Id.* at 23-27, 144-146.

a. **Reply:** Plaintiff argues, again without evidentiary support, that the "codes" on the school records indicate "semester start and end dates" rather than dates Plaintiff was in school. Her mis-reading of the records is apparent from their face. One column is labelled "Entry date," and the next "Withdrawal Date." Neither say "semester start date" or "semester end" date. Moreover, the "codes" simply prove the point: Plaintiff "entered" school (codes E01 and EA1) on the designated "entry date" and withdrew (either prior to completion, to enter another training program, or who "will continue in the class/program the next term or school year") on the dates designated "withdrawal." The school records display entry and withdrawal dates for Wellington High School Adult Program, from June 21, 2000 – August 15, 2000, from August 16, 2000 – August 13, 2001, and from August 14, 2001- September 20, 2001 and then an entry, that same day, September 20, 2001 at Survivor's Charter School. Plaintiff would have one believe that the records show a school on Plaintiff's official transcript that she never went to, Wellington High School Adult Program, that indicates she withdrew the very day she concededly entered Survivor's Charter School. Her intentional misreading of the record is yet another attempt to obfuscate Plaintiff's lack of memory regarding where and when she went to school, just like she failed to remember 8 jobs she held in 2000 whereas she claimed to have had one. The test is admissible evidence to the contrary, and Plaintiff

offers none. The flight logs (which show trips in early 2001) do not contradict the evidence because they are during the period of time she was enrolled in "Adult High School," a place where night classes were taught and where one might circumstantially infer, careful attendance records were not kept.

39. Undisputed Fact 39: During the year 2000, plaintiff worked at numerous jobs. In 2000, while living with her fiancé, plaintiff held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. Ex.R. Her taxable earnings that year totaled nearly $9,000. *Id.* Plaintiff cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs. Ex.Q at 470-471.

a. Reply: Plaintiff does not dispute the facts as presented, merely argues regarding their significance. The Social Security Administration records detail the five jobs at which she worked in 2000; the month and day of the jobs are irrelevant for purposes of this recitation of facts. Likewise, Plaintiff does not dispute the taxable earnings she made that year, or that she does not "remember" the jobs associated with Southeast Employee Management Company or Oasis Outsourcing (whether they were payroll or not), where she made $3,212 and $2,037 that year. She also "forgot" about her job at Neiman Marcus, where she made $1,440 in 2000, until she was confronted with the SSA records. McCawley Dec. Ex.5 at 53, 470.

40. Undisputed Fact 40: Plaintiff's employment at the Mar-a-Lago spa began in fall 2000. Plaintiff's father, Sky Roberts, was hired as a maintenance worker at the The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. Ex.S. Mr. Roberts worked there year-round for approximately 3 years. *Id.*; Ex.T at 72-73. After working there for a period

of time, Mr. Roberts became acquainted with the head of the spa area and recommended plaintiff for a job there. *Id.* at 72. Mar-a-Lago closes every Mother's Day and reopens on November 1. Ex.U at Mar-a-Lago0212. Most of employees Mar-a-Lago, including all employees of the spa area such as "spa attendants," are "seasonal" and work only when the club is open, i.e., between November 1 and Mother's Day. Ex.T at 72-73; Ex.U at Mar-a-Lago0212; Ex.V. Plaintiff was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

a. Reply: Plaintiff's response is misleading. First, she does not dispute that Mr. Roberts, her father began working at Mar-a-Lago in April 2000, nor that he worked there for some time, became acquainted with the head of the spa area and recommended his daughter for a job.

Second, Plaintiff contends that "job postings and job descriptions" "from 2002 and later are irrelevant." There are no such "job postings" cited. Rather, the job posting cited was from October 2000, the same time that Plaintiff was hired. *Compare* Ex.V (posting for "Saturday October 14 and Sunday October 15") with calendar for year 2000, showing Saturday and Sundays in October corresponding to those dates.

Finally, Plaintiff points to her own "recollection" as contrary proof. Her "recollection" about when she worked at Mar-a-Lago has shifted dramatically over time. First, she claimed it was 1998. *See* Jane Doe 102 complaint. Then, it was 1999. *See* Doc. 1, Complaint in this matter. Now, in this response she has changed her answer to 2000. Her vague recollections about what year have been off base, no credit should be given to her newfound recollection of which month she worked there. In any event, she presents no admissible credible evidence to contradict Mar-a-Lago's own records. Ex.U

at Mar-a-Lago0212 (spa not open from Mother's Day until November 1). Even Plaintiff's father, a longtime employee of Mar-a-lago admitted that the place "closed down" in the summer. Ex.T at 72-73. Plaintiff simply is not credible in her testimony that she recalls it being a "summer job," and the fact that she did not work at the spa until at least November 2000 at the age of 17 should be deemed admitted.

41. **Undisputed Fact 41: Plaintiff represented herself as a masseuse for Jeffrey Epstein.** While working at the Mar-a-Lago spa and reading a library book about massage, plaintiff met Ms. Maxwell. Plaintiff thereafter told her father that she got a job working for Jeffrey Epstein as a masseuse. Ex.T at 79. Plaintiff's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Mr. Roberts. *Id.* at 82-83. Plaintiff commenced employment as a traveling masseuse for Mr. Epstein. Plaintiff was excited about her job as a masseuse, about traveling with him and about meeting famous people. Ex.L at 56; Ex.P at 126. Plaintiff represented that she was employed as a masseuse beginning in January 2001. Ex.M; Ex.N. Plaintiff never mentioned Ms. Maxwell to her then-fiancé, Austrich. Ex.L at 74. Plaintiff's father never met Ms. Maxwell. Ex.T at 85.

a. **Reply:** Plaintiff does not actually refute any of the facts set forth above, but rather spends her time discussing different facts. Plaintiff's father testified to what she told him, that she "was going to learn massage therapy." Ex.T at 79. She does not contest her father's testimony that Mr. Epstein came out of the house and greeted her father and that her father never met Ms. Maxwell. *See* Reply to Undisputed Fact 41. Whether someone can receive a "massage license" under Florida law without a high school equivalency diploma is of no moment. Plaintiff does not dispute she represented

herself as a masseuse to others, in her own handwriting, beginning in January 2001. Exs. M and N. These facts should be deemed admitted.

42. **Undisputed Fact 42: Plaintiff resumed her relationship with convicted felon Anthony Figueroa.** In spring 2001, while living with Austrich, plaintiff lied to and cheated on him with her high school boyfriend, Anthony Figueroa. Ex.L at 68, 72. Plaintiff and Austrich thereafter broke up, and Figueroa moved into the Bent Oak apartment with plaintiff. Ex.L at 20; Ex.P at 28. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa in Plaintiff's presence punched Austrich in the face. Ex.X; Ex.L at 38-45. Figueroa and plaintiff fled the scene before police arrived. Ex.X. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance. Ex.Y.

a. **Reply:** Plaintiff argues relevance regarding these facts, but contests none of them. They should be deemed admitted. Plaintiff's lies, cheating, and association with a convicted felon and known drug abuser all are relevant in this defamation case concerning her reputation, purported damage to such reputation, and whether she was a known liar, as the January 2015 statement contends.

43. **Undisputed Fact 43: Plaintiff freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave."** In August 2001 at age 17, while living in the same apartment, plaintiff and Figueroa hosted a party with a number of guests. Ex.Z. During the party, according to plaintiff, someone entered plaintiff's room and stole $500 from her shirt pocket. *Id.* Plaintiff contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, plaintiff contacted the police to report that her former landlord had left her belongings by the roadside and

had lit her mattress on fire. Ex.AA. Again, plaintiff met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave." *Id.*

a. **Reply:** Plaintiff, again, presents no admissible evidence to contradict these facts, instead arguing their relevance. They should be deemed admitted.

44. **From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Plaintiff.** Flight logs maintained by Epstein's private pilot Dave Rodgers evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Plaintiff, between August 2001 and September 2002. Ex.BB. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Ex.CC at 6-15. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights. *Id.* at 99-100, 103. For substantially all of thirteen months of the twenty-two months (from November 2000 until September 2002) that Plaintiff lived in Palm Beach and knew Epstein, Epstein was traveling outside of Florida unaccompanied by Plaintiff. Ex.BB. During this same period of time, Plaintiff was employed at various jobs, enrolled in school, and living with her boyfriend.

a. **Reply:** Plaintiff goes to great lengths to dispute facts other than those presented as Undisputed Fact 44. Her voluminous, repetitive recitation of the flights that Plaintiff *was* on do nothing to demonstrate the 13 months of flights from July 2001 until August 2002 that Epstein and Maxwell *were on without Plaintiff*, as reflected in the logs. Her assertions regarding the other flights that she took, commercial or on another plane, do nothing to establish all of the many flights she *was not on* during 13 of the 22 month period during which Epstein and Maxwell were away from Palm Beach. Plaintiff does

not dispute that Epstein and Maxwell were on the flights without her. The facts as presented by Defendant should be deemed admitted.

45. **Undisputed Fact 45: Plaintiff and Figueroa shared a vehicle during 2001 and 2002.** Plaintiff and Figueroa shared a '93 white Pontiac in 2001 and 2002. Ex.P at 67; Ex.EE. Plaintiff freely traveled around the Palm Beach area in that vehicle. *Id.* In August 2002, Plaintiff acquired a Dodge Dakota pickup truck from her father. Ex.P at 67-68. Figueroa used that vehicle in a series of crimes before and after Plaintiff left for Thailand. *Id.*; Ex.FF.

a. **Reply:** Again, the Response has nothing to do with the facts stated. As Plaintiff concedes, she and Mr. Figueroa had one car that they both used. In fact, they traveled to and from school together. Ex.P at 67-68. She also does not dispute that she traveled freely around the Palm Beach area in that vehicle, or that "her car" was used in a series of thefts while she was in Thailand. All should be deemed admitted.

46. **Undisputed Fact 46: Plaintiff held a number of jobs in 2001 and 2002**. During 2001 and 2002, plaintiff was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant (aka CCI of Royal Palm Inc.), and at Roadhouse Grill. Ex.R. She also was employed at Courtyard Animal Hospital (aka Marc Pinkwasser DVM). *Id.;* Ex.W.

a. **Reply:** Plaintiff admits all of the facts set forth above, aside from the use of the word "gainfully." They should be deemed admitted.

47. **Undisputed Fact 47: In September 2002, Plaintiff traveled to Thailand to receive massage training and while there, met her future husband and eloped with him.** Plaintiff traveled to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the airport. While there, she initially contacted Figueroa frequently,

incurring a phone bill of $4,000. Ex.P at 35. She met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Mr. Figueroa's deposition in this matter in May 2016. *Id.* at 29, 37.

a. **Reply:** Again, Plaintiff does not refute the facts set forth, she simply offers her own interpretation of those facts. In the absence of any contrary evidence, they should be deemed admitted.

48. **Undisputed Fact 48: Detective Recarey's investigation of Epstein failed to uncover any evidence that Ms. Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography.** Joseph Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Jeffrey Epstein. Ex.GG at 10. That investigation commenced in 2005. *Id.* Recarey worked only on the Epstein case for an entire year. *Id.* at 274. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein. *Id.* at 212-215. Detective Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Ms. Maxwell's name and she was never considered a suspect by the government. *Id.* at 10-11, 180-82, 187-96, 241-42, 278. None of Epstein's alleged victims said they had seen Ms. Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. *Id.* Indeed, none of Epstein's alleged victims ever reported to the government they had met or spoken to Ms. Maxwell. Maxwell was not seen coming or going from the house during the law enforcement surveillance of Epstein's home. *Id.* at 214-215. The arrest warrant did not mention Ms. Maxwell

and her name was never mentioned before the grand jury. *Id.* at 203, 211. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. *Id.* at 257. Detective Recarey, when asked to describe "everything that you believe you know about Ghislaine Maxwell's sexual trafficking conduct," replied, "I don't." *Id.* at 278. He confirmed he has no knowledge about Ms. Maxwell sexually trafficking anybody. *Id.* at 278-79. Detective Recarey also has no knowledge of Plaintiff's conduct that is subject of this lawsuit. *Id.* at 259-260.

a. **Reply**: Plaintiff offers several misleading "contrary" facts, none of which actually address the facts presented herein, namely whether Ms. Maxwell was ever mentioned by any of Epstein's alleged victims, whether she was the target of their investigation, and whether any of her property was seized from Epstein's home. Plaintiff cites to numerous inadmissible pieces of evidence on facts other than those. Mr. Rodriguez, a convicted felon for obstructing justice related to the Epstein case, is dead and his deposition testimony is the subject of a motion in limine because Ms. Maxwell has never had the opportunity to cross examine him. Doc. 567 at 14. Ms. Rabuyo likewise is not a witness who has been deposed in this case, and therefore her "testimony" is not admissible against Ms. Maxwell. The message pads are not authenticated by anyone, as will be the subject of a forthcoming motion *in limine*. And there is not one shred of evidence that any child pornography, as opposed to a topless photo of a very adult Ms. Maxwell, were ever found in Epstein's home. The facts should be deemed admitted, as those proferred by Defendant are based on admissible evidence.

49. **Undisputed Fact 49: No nude photograph of Plaintiff was displayed in Epstein's home.** Epstein's housekeeper, Juan Alessi, "never saw any photographs of Virginia

Roberts in Mr. Epstein's house." Ex.HH at ¶ 17. Detective Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office. Ex.GG at 289-90.

a. **Reply:** Plaintiff offered no evidence that a nude photograph of *her* was displayed in Epstein's home. All of the testimony she submits has nothing to do with a nude photograph of herself. The fact should be deemed admitted.

50. **Undisputed Fact 50: Plaintiff intentionally destroyed her "journal" and "dream journal" regarding her "memories" of this case in 2013 while represented by counsel.** Plaintiff drafted a "journal" describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. Ex.II at 64-65, 194; Ex.N at 205-08. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. *Id.* Plaintiff also kept a "dream journal" regarding her thoughts and memories that she possessed in January 2016. Ex.II at 194-96. To date, Plaintiff cannot locate the "dream journal." *Id.*

a. **Reply:** Plaintiff offers no contrary admissible regarding her destruction of her journal and it should be deemed admitted.

51. **Undisputed Fact 51: Plaintiff publicly peddled her story beginning in 2011.** Plaintiff granted journalist Sharon Churcher extensive interviews that resulted in seven (7) widely distributed articles from March 2011 through January 2015. Doc. 216 ¶¶ 2-11 and referenced exhibits; Doc. 261-1 to 216-8, incorporated by reference. Churcher regularly communicated with plaintiff and her "attorneys or other agents" from "early 2011" to "the present day." Plaintiff received approximately $160,000 for her stories and pictures that were published by many news organizations. Ex.N at 247-248.

a. **Reply:** Plaintiff offers no evidence to contradict the facts asserted and they should therefore be deemed admitted. Plaintiff's unsupported spin of those facts should be stricken.

52. **Undisputed Fact 52: Plaintiff drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish.** In 2011, contemporaneous with her Churcher interviews, plaintiff drafted a book manuscript which purported to document plaintiff's experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Ex.KK. Plaintiff communicated with literary agents, ghost writers and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

a. **Reply:** Plaintiff cites inadmissible evidence, and attorney argument, in contradiction of these facts. They should be ignored. The "Victim Notification Letter" is inadmissible hearsay. The psychologist records likewise are inadmissible hearsay. The FBI interview is inadmissible hearsay. Plaintiff's counsel then flatly misrepresents to the Court her own client's characterization of the book manuscript, calling it a "fictionalized account." Plaintiff, contradicting her counsel, testified that the book manuscript is "99% true."

Q Is there anything -- well, first of all, did you author that entire manuscript?
A Yes, I did.
Q Did anyone else author part of that manuscript?
A Do you mean did anyone else write this with me?
Q Right.
A No.
Q That's all your writing?

> A This is my writing.
>
> Q Okay. To the best of your recollection as you sit here right now, is there anything in that manuscript about Ghislaine Maxwell that is untrue?
>
> A I don't believe so. Like I said, there is a lot of stuff that I actually have left out of here.
>
> Q Um-hum.
>
> **A. So there is a lot more information I could put in there. But as far as Ghislaine Maxwell goes, I would like to say that there is 99.9 percent of it would be to the correct knowledge.**
>
> Q All right. Is there anything that you -- and I understand you're doing this from memory. Is there anything that you recall, as you're sitting here today, about Ghislaine Maxwell that is contained in that manuscript, that is not true?
>
> **A You know, I haven't read this in a very long time. I don't believe that there's anything in here about Ghislaine Maxwell that is not true.**

EXHIBIT RR at 42-43 (emphasis added).

Plaintiff clearly now would like to spin the book manuscript as "fictionalized" because she is well aware that the "facts" presented by her in that manuscript are contradicted by many other documentary and testimonial records. Yet she offers no admissible evidence that Plaintiff intended the manuscript to be fictional. Citations to social scientists who have not testified in this case and whose work has not even be cited by any expert in this case is wholly improper and should be stricken.

53. **Undisputed Fact 53: Plaintiff's publicly filed "lurid" CVRA pleadings initiated a media frenzy and generated highly publicized litigation between her lawyers and Alan Dershowitz.** On December 30, 2014, plaintiff, through counsel, publicly filed a joinder motion that contained her "lurid allegations" about Ms. Maxwell and many others, including Alan Dershowitz, Prince Andrew, Jean-Luc Brunel. The joinder motion was followed by a "corrected" motion (Ex.D) and two further declarations in January and February 2015, which repeated many of plaintiff's claims. These CVRA pleadings generated a media maelstrom and spawned highly publicized litigation between plaintiff's lawyers, Edwards and Cassell, and Alan

Dershowitz. After plaintiff publicly alleged Mr. Dershowitz of sexual misconduct, Mr. Dershowitz vigorously defended himself in the media. He called plaintiff a liar and accused her lawyers of unethical conduct. In response, attorneys Edwards and Cassell sued Dershowitz who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organizations. Doc. 363 at 363-1 through 363-14.

a. **Reply:** Plaintiff offers no contrary facts and so they should be deemed admitted.

54. **Undisputed Fact 54: Plaintiff formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy.** In 2014, plaintiff, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to plaintiff, the purpose of the organization is to promote plaintiff's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse. Ex.LL. Plaintiff attempts to promote Victims Refuse Silence at every opportunity. Ex.MM at 17-18. For example, plaintiff participated in an interview in New York with ABC to promote the charity and to get her mission out to the public. *Id.* at 28.

a. **Reply:** Plaintiff offers no contrary evidence and the facts should be deemed admitted.

II. The Court should strike plaintiff's statement of "undisputed facts."

The summary-judgment procedure is well established. When the summary-judgment non-movant bears the burden of proof at trial, as in the case at bar, the movant may show a *prima facie* entitlement to summary judgment in one of two ways: (1) the movant may point to evidence that negates the non-movant's claims, or (2) the movant may identify those portions of its opponent's evidence that demonstrate the absence of a genuine issue of material fact.

Salahuddin v. Goord, 467 F.3d 263, 272-73 (2d Cir. 2006). If the movant makes this showing in either manner, the burden shifts to the nonmovant to identify record evidence creating a genuine issue of material fact. *Id.* at 273.

Local Civil Rule 56.1(a) carries out this summary-judgment procedure by requiring the summary-judgment movant to set forth "material facts as to which she contends there is no genuine issue to be tried." Subsection (b) of the rule requires the party opposing summary judgment to set forth a "statement of additional material facts as to which it is contended that *there exists a genuine issue to be tried*" (emphasis supplied).

Ms. Maxwell has moved for summary judgment; plaintiff has not. As movant, Ms. Maxwell is required under Local Civil Rule 56.1 to enumerate the facts she is asserting as undisputed; as the party opposing summary judgment, plaintiff is permitted—if she can—to introduce admissible evidence creating a genuine issue of material fact. *See* Fed. R. Civ. P. 56(c)(1).

Plaintiff is confused. Plaintiff believes she—the party *opposing* summary judgment—must enumerate facts she is asserting as undisputed, and so she has submitted her own Rule 56.1 statement of "undisputed facts." That gets the summary-judgment procedure exactly backwards. *Plaintiff*'s "undisputed facts" are irrelevant. Plaintiff cannot avoid summary judgment by proposing "undisputed facts"; she may only do so by creating a genuine issue of material fact *as to Ms. Maxwell's statement of undisputed facts.* Accordingly, this Court should strike plaintiff's statement of "undisputed facts."

Although Ms. Maxwell as the summary-judgment movant has no duty to respond to plaintiff's alleged "undisputed facts," we hasten to add that Ms. Maxwell in fact opposes and disputes most of plaintiff's alleged "undisputed facts." For example, Defendant's Undisputed

Fact 40 includes the statement, "Ms. Giuffre was hired as a 'seasonal' spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17." Yet, Plaintiff sets forth as her own "Undisputed Fact 58" that "Virginia [got] job at Mar-a-Lago in 2000, either months before or just after [her] 17th birthday." Plaintiff has done nothing more than set forth her "dispute" with Defendant's Undisputed Fact 40 as her own "undisputed fact." It makes no sense. *See also* Plaintiff's "Undisputed Fact" 63. The other alleged undisputed facts are simply Plaintiff's assertion of her deposition testimony, and hearsay of her statements to other witnesses, couched as "Undisputed Facts." Ms. Maxwell strenuously disputes almost all of the alleged "undisputed facts" claiming that she engaged in any sexual acts, misconduct or communications with plaintiff or others; indeed, over the course of two days and thirteen hours of deposition Ms. Maxwell disputed all such allegations.

Because none of Plaintiff's "undisputed facts" have anything to do with the issues raised by Defendant's Motion for Summary Judgment, Ms. Maxwell moves to strike plaintiff's statement of "undisputed facts."

Conclusion

For the foregoing reasons, Ms. Maxwell requests that the Court deem her Undisputed Facts admitted, and that the Court strike plaintiff's statement of "undisputed facts."

Dated: February 10, 2017

Respectfully submitted,

/s/ Laura A. Menninger

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lmenninger@hmflaw.com

Attorneys for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on February 10, 2017, I electronically served this *Defendant's Reply to Plaintiff's Statement of Contested Facts and Plaintiff's "Undisputed Facts" Pursuant to Local Civil Rule 56.1* via ECF on the following:

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smccawley@bsfllp.com
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/s/ Nicole Simmons
Nicole Simmons

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

--X

15-cv-07433-RWS

Declaration of Laura A. Menninger in Support of
<u>Defendant's Reply in Support of Motion for Summary Judgment</u>

I, Laura A. Menninger, declare as follows:

1. I am an attorney at law duly licensed in the State of New York and admitted to practice in the United States District Court for the Southern District of New York. I am a member of the law firm Haddon, Morgan & Foreman, P.C., counsel of record for Defendant Ghislaine Maxwell in this action. I respectfully submit this Declaration in support of Ms. Maxwell's Reply in Support of Motion for Summary Judgment.[1]

2. In Defendant's Memorandum of Law in Support of Motion for Summary Judgment (filed Jan. 9, 2017), I included numbered paragraphs corresponding to undisputed facts from the movant's perspective as contemplated by Local Civil Rule 56.1(a), together with the citation to admissible evidence as required by Fed. R. Civ. P. 56(c). *See* Doc. 541, *passim.*

[1] At trial, defendant intends to produce either the custodian of record relevant to any disputed document or a certification in compliance with either Fed. R. Evid. P. 803 and/or 902. *See* Fed. R. Civ. P. 56(c). Apart from deposition testimony, the majority of non-deposition documents herein were either produced by plaintiff or obtained with releases signed by plaintiff.

3. On January 9, 2017, I also prepared and served on the Court and counsel, under seal, Defendant's Statement of Material Undisputed Facts Pursuant to Local Civil Rule 56.1 ("Statement"). Those paragraphs mirror the numbered paragraphs contained within the Memorandum of Law, minus the citations to the evidentiary record. The Statement was filed with the Court in hard-copy and placed in the vault (*see* Doc.543).

4. Through a clerical oversight, a redacted version of the Statement was not appended to the filed ECF version of the Notice of Motion for Summary Judgment (Doc. 537). However, as noted in the previous two paragraphs, Ms. Maxwell enumerated all undisputed facts in accordance with Local Civil Rule 56.1(a) in:

- Ms. Maxwell's Memorandum of Law in Support of Motion for Summary Judgment (Doc.541); and
- the Local Rule 56.1 Statement served on the the Court and counsel and filed in hard copy with the Court.

5. Attached as Exhibit NN (filed under seal) is a true and correct copy of Defendant, Ghislaine Maxwell's Initial Disclosure Pursuant to Fed. R. Civ. P. 26, served February 24, 2016.

6. Attached as Exhibit OO (filed under seal) is a true and correct copy of an email correspondence from Plaintiff to Sharon Churcher, dated May 12, 2011, Bates stamped GIUFFRE004096-7; 004028-30.

7. Attached as Exhibit PP (filed under seal) are true and correct copies of excerpts from the November 14, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

8. Attached as Exhibit QQ (filed under seal) is a true and correct copy of an email correspondence from Plaintiff to Sharon Churcher, dated May 12, 2011, Bates stamped GIUFFRE003959.

9. Attached as Exhibits RR (filed under seal) are true and correct copies of excerpts from the May 3, 2016 deposition of Virginia Giuffre, designated Confidential under the Protective Order.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 10, 2017.

s/ Laura A. Menninger
Laura A. Menninger

CERTIFICATE OF SERVICE

I certify that on February 10, 2017, I electronically served this *Declaration of Laura A. Menninger in Support of Defendant's Reply to Her Motion for Summary Judgment* via ECF on the following:

Sigrid S. McCawley
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/s/ Nicole Simmons
Nicole Simmons

EXHIBIT NN

United States District Court
Southern District Of New York

--X

Virginia L. Giuffre,

Plaintiff,

v. **15-cv-07433-RWS**

Ghislaine Maxwell,

Defendant.

--X

DEFENDANT GHISLAINE MAXWELL'S
INITIAL F.R.C.P. 26(a)(1)(A) DISCLOSURES

Pursuant to F.R.C.P. 26(a)(1)(A), Defendant Ghislaine Maxwell makes the following disclosures:

I. IDENTITIES OF INDIVIDUALS LIKELY TO HAVE DISCOVERABLE INFORMATION RELEVANT TO DISPUTED FACTS ALLEGED WITH PARTICULARITY IN THE PLEADINGS

1. Ghislaine Maxwell
c/o Laura A. Menninger, Esq.
Haddon, Morgan & Foreman, P.C.
150 E. 10th Ave.
Denver, CO 80203
303-831-7364
LMenninger@HMFLaw.com

Ms. Maxwell is the Defendant and may have knowledge concerning matters at issue, including the events of 1999-2002 and the publication of statements in the press in 2011-2015.

2. Virginia Lee Roberts Giuffre
c/o Sigrid S. McCawley, Esq.
Boies, Schiller & Flexner LLP
401 East Las Olas Boulevard, Suite 1200

Miami, Florida 33301
(954) 356-0011
smccawley@bsfllp.com

Ms. Giuffre is the Plaintiff and has knowledge concerning the matters at issue in her Complaint, including the events of 1996-2015 and the publication of statements in the press in 2011-2015.

3. Philip Barden
Devonshires Solicitors LLP
30 Finsbury Circus
London, United Kingdom
EC2M 7DT
DX: 33856 Finsbury Square
(020) 7628-7576
Philip.Barden@devonshires.co.uk

Mr. Barden has knowledge concerning press statements by Plaintiff and Defendant in 2011-2015 at issue in this matter.

4. Paul Cassell
College of Law, University of Utah
383 South University Street
Salt Lake City, UT 84112
801-585-5202
paul.cassell@law.utah.edu

Mr. Cassell has knowledge concerning press statements by Plaintiff, Plaintiff's court pleadings, and Plaintiff's sworn testimony.

5. Alan Dershowitz
c/o Richard A. Simpson, Esq.
WILEY REIN, LLP
1776 K Street NW
Washington, D.C. 20006
(202) 719-7000

Mr. Dershowitz has knowledge concerning Plaintiff's false statements to the press, in court pleadings, and in sworn testimony, at issue in this matter.

6. Bradley Edwards
Farmer, Jaffe, Weissing, Edwards, Fistos & Lehrman, P.L.
425 N. Andrews Ave., Suite 2
Ft. Lauderdale, FL 33301
(954) 524-2820
brad@pathtojustice.com

Dated: February 24, 2016.

Respectfully submitted,

s/ Laura A. Menninger

Laura A. Menninger (LM-1374)
HADDON, MORGAN AND FOREMAN, P.C.
150 East 10th Avenue
Denver, CO 80203
Phone: 303.831.7364
Fax: 303.832.2628
lmenninger@hmflaw.com

Attorney for Ghislaine Maxwell

CERTIFICATE OF SERVICE

I certify that on February 24, 2016, I electronically served this *DEFENDANT GHISLAINE MAXWELL'S INITIAL F.R.C.P. 26(A)(1) DISCLOSURES* via e-mail on the following:

Sigrid S. McCawley
BOIES, SCHILLER & FLEXNER, LLP
401 East Las Olas Boulevard, Ste. 1200
Ft. Lauderdale, FL 33301
smccawley@bsfllp.com

s/ Laura A. Menninger
Laura A. Menninger

EXHIBIT OO

To: Sharon.Churcher@mailonsunday.co.uk[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Thur 5/12/2011 2:21:43 AM
Importance: Normal
Subject: Re: Good News!!
Received: Thur 5/12/2011 2:21:43 AM

Thanks again Shazza, I'm bringing down the house with this book!!!
xoxo Jenna

--- On **Wed, 11/5/11, Sharon.Churcher@mailonsunday.co.uk** *<Sharon.Churcher@mailonsunday.co.uk>* wrote:

From: Sharon.Churcher@mailonsunday.co.uk <Sharon.Churcher@mailonsunday.co.uk>
Subject: Re: Good News!!
To: "Virginia Giuffre" <[redacted]
Received: Wednesday, 11 May, 2011, 4:17 PM

Don't forget Alan Dershowitz...JE's buddy and lawyer..good name for your pitch as he repped Claus von Bulow and a movie was made about that case...title was Reversal of Fortune. We all suspect Alan is a pedo and tho no proof of that, you probably met him when he was hanging put w JE

|------------>
|From: |
|------------>
>--|
|Virginia Giuffre [r[redacted]] |
>--|
|------------>
|To: |
|------------>
>--|
|Sharon Churcher |
>--|
|------------>
|Date:
|------------>
>--|
|10/05/2011 23:00 GDT |
>--|
|------------>
|Subject: |
|------------>
>--|
|Good News!! |
>--|

|--|
|Hi Sharon, |
|
|Hello gorgeous, I hope this message comes to you on a bright, sunny day!!!|
|I took your advice about what to offer Sandra and she accepted. Were |
|drawing up a contract through her agent right now and getting busy to meet|

|my deadline. Just wondering if you have any information on you from when |
|you and I were doing interviews about the J.E story. I wanted to put the |
|names of some of these assholes, oops, I meant to say, pedo's, that J.E
|sent me to. With everything going on my brain feels like mush and it would|
|be a great deal of help! |
|Having fun sweetie? |
|
|Thanks, |
Jenna

To: Sharon Churcher[Sharon.Churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Wed 6/8/2011 11:19:55 PM
Importance: Normal
Subject: Re: Virginia Roberts
Received: Wed 6/8/2011 11:19:55 PM

Hi Buddy,

You are absolutely right...nail biting is an understatement of the century!!!
We didn't have any trouble with spiders or anything like that yesterday, it was more my daughter that gave everyone a spook! She wandered off when I turned my back to look at homemade jam and found her outside in the bush chasing the roo's!! My own miniature Tarzan!!!

My fingers and toes are crossed and I'm thinking positive!!!

Much Love,
Jenna

--- On **Wed, 8/6/11, Sharon Churcher** ***<Sharon.Churcher@mailonsunday.co.uk>*** wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Re: Virginia Roberts
To: "'[REDACTED]>
Received: Wednesday, 8 June, 2011, 11:59 AM

Roos. You lucky things -- but did you have to duck under spider webs? They were strung between trees when I went.

Re Jarred: it is a nailbiting wait but remember he is only one agent. He was keen to see it which is good. If he doesn't go for it, there are others. Different tastes. When did you send it?
Shazza
XOOO

From: Virginia Giuffre [REDACTED]
Sent: Wednesday, June 08, 2011 07:27 AM
To: Sharon Churcher
Subject: Re: Virginia Roberts

Dearest Shazza,
Once again you have really outdone yourself...MANY, MANY, THANKS!!!

I took the kids to the Australian Walkabout Park today and enjoyed the scenic walks and many kangaroos. Rob and I hac good chuckle about our adventures at the Reptile Park with you and Mike ...good times!! Have you heard from Mike? I hope he is well and if you ever speak, tell him I sent a BIG hello.

I really appreciate everything you have helped with, as a friend you have gone beyond the call of duty!!!

I hope we hear back from Jarred soon!!

xoxoxo Jenna

--- On **Wed, 8/6/11, Sharon Churcher** ***<Sharon.Churcher@mailonsunday.co.uk>*** wrote:

From: Sharon Churcher <Sharon.Churcher@mailonsunday.co.uk>
Subject: Virginia Roberts
To: "jarred halperin agent (jarred@objectivecnt.com)" <jarred@objectivecnt.com>
Cc: "Virginia Giuffre" <[REDACTED]
Received: Wednesday, 8 June, 2011, 2:31 AM

Hi Jarred

Hopefully you have Virginia's book pitch by now.

She has some amazing names which she can share with you in confidence and I think she also has a human interest story that could appeal to the Oprah/female set as well as the Wall Streeters who follow Epstein – a hedge fund king.

Here are a few of our stories about Virginia, plus some examples of the massive US and other international media pickup. Vanity Fair are doing a piece I believe in their August issue. The FBI have reopened the Epstein case due to Virginia's revelations. I also am attaching a link to a NY Magazine profile of Epstein.....written before his world combusted. The FBI believe he was essentially running a private – and mobile -- brothel for some of the world's richest and most influential men.

He got off the first time round after retaining Kenneth Starr (who witchhunted Bill Clinton) and Alan Dershowitz (von Bulow's appeal lawyer, who inspired the movie Reversal of Fortune). The US Justice Dept is investigating corruption allegations against at least one prosecutor involved in the case.

Best regards,

Sharon

http://www.dailymail.co.uk/news/article-1361039/Prince-Andrew-girl-17-sex-offender-friend-flew-Britain-meet-him.html

http://www.dailymail.co.uk/news/article-1363452/Bill-Clinton-15-year-old-masseuse-I-met-twice-claims-Epsteins-girl.html

http://www.nypost.com/p/news/local/manhattan/pervy_mogul_lent_me_out_Balv1lrcQg9ADFlOXewyoJ

http://blogs.villagevoice.com/runninscared/2011/02/virginia_robert.php

http://billionaires.forbes.com/article/03rxgl12lP9nv (This one, in Forbes Magazine, seems to require subscribing but you get the gist)

http://www.telegraph.co.uk/news/uknews/theroyalfamily/8362690/Prince-Andrew.html

http://www.dailytelegraph.com.au/news/the-prince-a-paedophile-and-the-sex-slave-teen/story-e6freuy9-1226013783994

http://nymag.com/nymetro/news/people/n_7912/

For more information please visit http://www.messagelabs.com/email

---

EXHIBIT PP

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEO DEPOSITION OF
VIRGINIA GIUFFRE, VOLUME II

November 14, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq.
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Suite 1200
Fort Lauderdale, FL 33301
Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.
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3 Jeffrey S. Pagliuca, Esq.
150 East 10th Avenue
4 Denver, CO 80203
Phone: 303.831.7364
5 lmenninger@hmflaw.com
jpagliuca@hmflaw.com
6 Appearing on behalf of the
Defendant
7
Also Present:
8 Ann Lundberg, Paralegal
Maryvonne Tompkins, Videographer
9

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1 Pursuant to Notice and the Federal Rules
2 of Civil Procedure, the continued video
3 deposition of VIRGINIA GIUFFRE, called by Defendant,
4 was taken on Monday, November 14, 2016, commencing at
5 8:04 a.m., at 150 East 10th Avenue, Denver, Colorado,
6 before Pamela J. Hansen, Registered Professional
7 Reporter, Certified Realtime Reporter and Notary
8 Public within Colorado.
9
* * * * * * *
10 I N D E X
11 VIDEO DEPOSITION OF VIRGINIA GIUFFRE, VOLUME II
12 EXAMINATION PAGE

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2

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Exhibit 11	7/6/2016 letter to Schultz from Hayek, with attachments	484
Exhibit 12	Patient Registration Information, with attachments	490
Exhibit 13	CVS Prescription Records document, 7/29/2016, with attachment	502
Exhibit 14	Affidavit of Custodian of Records, Walgreen Company, with attachments	507

25

DESCRIPTION		INITIAL REFERENCE
Exhibit 15	Patient Health Summary, Clifton Beach Medical & Surgical, printed on 6/28/2016	512
Exhibit 16	Portions of deposition transcript of Virginia Giuffre taken May 3, 2016	533
Exhibit 17	Amendment/Errata Sheet signed May 31, 2016 by Virginia Giuffre	540
Exhibit 18	Ad for Mar-a-Lago Club	548
Exhibit 19	The Mar-a-Lago Club, L.C. Employment Policies, October 28, 1995	549
Exhibit 20	Page from the Mar-a-Lago Club Employment Policies, Revised 10/2001	550

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1 didn't see them take pictures of the backs of them.
2 I'm not too sure who.
3 Q You don't remember sending to them a
4 photograph that included this wood around another
5 photograph?
6 A No.
7 Q Okay. You have mentioned a journalist by
8 the name of Sharon Churcher.
9 A Yes.
10 Q You are aware that Sharon Churcher
11 published news stories about you?
12 A Yes.
13 MS. MCCAWLEY: Objection.
14 Go ahead.
15 Q (BY MS. MENNINGER) Is anything that you
16 have read in Sharon Churcher's news stories about you
17 untrue?
18 A I think Sharon did print some things that
19 I think she elaborated or maybe misheard. But, I
20 mean, if you have a specific document to show me, I'd
21 love to look at it and read it and tell you what I
22 think.
23 Q Is there anything, as you sit here today,
24 that you know of that Sharon Churcher printed about
25 you that is not true?

1 A Not off the top of my head. If you show
2 me, like, a news clipping article or something, I can
3 definitely read it for you.
4 Q Is there anything that you know of that
5 Sharon Churcher has printed about Ghislaine Maxwell
6 that is not true?
7 A No, not off -- no, not off the top of my
8 head.
9 Q Is there anything that you recall saying
10 to Sharon Churcher that she then printed something
11 different than what you had said to her?
12 A Yeah, I've read stuff. I mean, I just --
13 I can't remember what, but I read something that I
14 think was, Oh, she got that wrong. I can't remember
15 an exact example off the top of my head.
16 Q Did you ever complain to Sharon Churcher
17 about things that she got wrong?
18 A I didn't see a point. I might have, but
19 I -- I didn't see a point really because it's already
20 printed, you know.
21 Q You had a fairly voluminous set of
22 communications with Sharon Churcher by e-mail,
23 correct?
24 MS. MCCAWLEY: Objection.
25 A Voluminous, like a lot of them?

1 Q (BY MS. MENNINGER) Yes.
2 A Yes.
3 Q And during any of those communications, do
4 you know whether she printed things about you after
5 you had any of those communications?
6 MS. MCCAWLEY: Objection.
7 A I don't know. I know a lot of stuff was
8 printed, and I never really stopped to read who
9 printed the article, or wrote the article, I should
10 say. Sorry.
11 Q (BY MS. MENNINGER) Okay. I'll show you
12 Defendant's Exhibit 7.
13 (Exhibit 7 marked.)
14 THE DEPONENT: Thank you.
15 Q (BY MS. MENNINGER) I'll let you read
16 through the statements on the first page there, and
17 if there is anything that is not absolutely true,
18 just put a check by it and we'll come back to it.
19 A It's not very clear how she wrote it. "I
20 flew to the Caribbean with Jeffrey and then Ghislaine
21 Maxwell went to pick up Bill in a huge black
22 helicopter that Jeffrey had bought her."
23 That wasn't an eyewitness statement.
24 Like, I didn't see her do it. Ghislaine was the one
25 who told me about that; that she's the one who flew

1 Bill.

2 Q All right. If you just want to put a

3 check by it, then we'll just come back and talk about

4 each one.

5 A Okay.

6 Q Just to move things along.

7 A Okay. I have made three checkmarks.

8 Q All right.

9 MS. MCCAWLEY: And I just -- before you

10 continue, I just want to identify for the record,

11 since this doesn't have any identifiers on it, are

12 you representing that these are statements from

13 Sharon Churcher?

14 MS. MENNINGER: I'm not representing

15 anything. I'm asking the witness questions about

16 these statements. I asked her is anything on here

17 not true. That's all I asked her.

18 Q (BY MS. MENNINGER) So which ones did you

19 put checkmarks by, Ms. Giuffre?

20 A I'd have been -- I'm sorry. "I'd have

21 been about 17 at the time. I flew to the Caribbean

22 with Jeffrey and then Ghislaine Maxwell went to pick

23 up Bill in a huge black helicopter that Jeffrey had

24 bought her."

25 Q Okay. And what else did you put a check

1 by?

2 A "I used to get frightened flying with her

3 but Bill had the Secret Service with him and I

4 remember him talking about what a good job" --

5 sorry -- "job she did."

6 Q Okay. And what else did you put a check

7 by?

8 A "Donald Trump was also a good friend of

9 Jeffrey's. He didn't partake in any sex with any of

10 us but he flirted with me. He'd laugh and tell

11 Jeffrey, 'you've got the life.'"

12 Q Other than the three you've just

13 mentioned --

14 A Yeah.

15 Q -- everything else on here is absolutely

16 accurate?

17 MS. MCCAWLEY: Objection.

18 A Yes. Well, to the best of my

19 recollection, yes.

20 Q (BY MS. MENNINGER) All right. What is

21 inaccurate about, "I'd have been about 17 at the

22 time. I flew to the Caribbean with Jeffrey and then

23 Ghislaine Maxwell went to pick up Bill in a huge

24 black helicopter that Jeffrey had bought her"?

25 A Because it makes it kind of sound like an

1 eyewitness thing.
2 Q Okay. Did you say that statement to
3 Sharon Churcher?
4 A I said to Sharon that Ghislaine told me
5 that she flew Bill in the heli- -- the black
6 helicopter that Jeffrey bought her, and I just wanted
7 to clarify that I didn't actually see her do that. I
8 heard from Ghislaine that she did that.
9 Q You heard that from Ghislaine, and then
10 you reported to Sharon Churcher that you had heard
11 that from Ghislaine.
12 A Correct.
13 MS. MCCAWLEY: Objection.
14 A I heard a lot of things from Ghislaine
15 that sounded too true -- too outrageous to be true,
16 but you never knew what to believe, so...
17 Q (BY MS. MENNINGER) Okay. And after
18 Sharon Churcher printed what she said you said, did
19 you complain to her that it was inaccurate?
20 A I might have verbally with her, but again,
21 I didn't see a point in making a hissy over it
22 because what was done was done. She had already
23 printed.
24 Q What was inaccurate about, "I used to get
25 frightened flying with her but Bill" said -- "had the

1 Secret Service with him and I remember him talking
2 about what a good job she did"?
3 A I just don't remember saying that to her.
4 I don't remember saying I remember him talking about
5 what a good job she did.
6 Q All right.
7 A I just don't remember that at all.
8 Q Okay. And I guess, just to be clear, my
9 questions wasn't do you remember saying this to
10 Sharon Churcher; my question is, is that statement
11 accurate?
12 MS. MCCAWLEY: Well, objection.
13 Q (BY MS. MENNINGER) Did you used to get
14 frightened flying with her?
15 A Yes.
16 Q Okay. Did Bill have the Secret Service
17 with him?
18 A They were there, but not like on the --
19 not where we were eating.
20 Q Do you remember Bill talking about what a
21 good job she did?
22 A I don't remember that.
23 Q So what is inaccurate about that
24 statement?
25 A I just -- it's inaccurate because I don't

1 remember him talking about what a good job she did.
2 I don't remember that.
3 Q Does it inaccurately suggest that Bill had
4 the Secret Service with him on a helicopter?
5 MS. MCCAWLEY: Objection.
6 A Well, not being an eyewitness to it, I
7 wouldn't be able to tell you. I can't tell you what
8 I don't know.
9 Q (BY MS. MENNINGER) And do you believe you
10 said that statement to Sharon Churcher?
11 A I mean, Sharon and I talked a lot, and if
12 she misheard me or just wrote it in the way that she
13 thought she should, I have no control over that. So
14 I'm not too sure.
15 Q Did she record your interviews?
16 A Some of them. Some of them she didn't. I
17 mean, we, like -- we, like, met for like a week, and
18 we spent a lot of time together, and then even after
19 that we just continued, like, kind of a friendship.
20 Q All right. What's inaccurate about the
21 last statement on that page?
22 A "Donald Trump was also a good friend of
23 Jeffrey's." That part is true.
24 "He didn't partake in any" of -- "any sex
25 with any of us but he flirted with me." It's true

1 that he didn't partake in any sex with us, and but
2 it's not true that he flirted with me. Donald Trump
3 never flirted with me.
4 Then the next sentence is, "He'd laugh and
5 tell Jeffrey, 'you've got the life.'" I never said
6 that to her.
7 Q When you say, "he didn't partake in any
8 sex with any of us," who is "us"?
9 A Girls. Just --
10 Q How do you know who Donald Trump -- Trump
11 had sex with?
12 A Oh, I didn't physically see him have sex
13 with any of the girls, so I can't say who he had sex
14 with in his whole life or not, but I just know it
15 wasn't with me when I was with other girls.
16 Q And who were the other girls that you were
17 with in Donald Trump's presence?
18 A None. There -- I worked for Donald Trump,
19 and I've met him probably a few times.
20 Q When have you met him?
21 A At Mar-a-Lago. My dad and him, I wouldn't
22 say they were friends, but my dad knew him and they
23 would talk all the time -- well, not all the time but
24 when they saw each other.
25 Q Have you ever been in Donald Trump and

Agren Blando Court Reporting & Video, Inc.

1 Jeffrey Epstein's presence with one another?
2 A No.
3 Q What is the basis for your statement that
4 Donald Trump is a good friend of Jeffrey's?
5 A Jeffrey told me that Donald Trump is a
6 good friend of his.
7 Q But you never observed them together?
8 A No, not that I can actually remember. I
9 mean, not off the top of my head, no.
10 Q When did Donald Trump flirt with you?
11 A He didn't. That's what's inaccurate.
12 Q Did you ever see Donald Trump at Jeffrey's
13 home?
14 A Not that I can remember.
15 Q On his island?
16 A No, not that I can remember.
17 Q In New Mexico?
18 A No, not that I can remember.
19 Q In New York?
20 A Not that I can remember.
21 Q All right. If you could turn to the
22 second page and read through those. Let me know if
23 any of those are inaccurate. Just put a check by
24 them and then we'll come back.
25 A Okay.

1 MS. MCCAWLEY: Before you go, Virginia,
2 I'm going to object to the use of the second page of
3 this document. There's no time frame on it. There's
4 no source reference to it, so it's entirely unclear
5 where this has come from.
6 Q (BY MS. MENNINGER) Okay. Are you done?
7 A Yes.
8 Q Okay. What's the first one you've put a
9 check by?
10 A "The hammock photo was all over the
11 houses," in parentheses. And Bill Clinton and -- I'm
12 sorry, "Bill Clinton and Andrew," in parentheses,
13 "had to have seen it."
14 "All over the houses" is not my statement
15 and an exaggeration. They did have that picture in
16 the houses. And I believe, if I remember the
17 conversation correctly, she asked, Could have Bill
18 Clinton and Andrew seen the picture? And I said,
19 Yes, it's possible that they could have seen it.
20 So, I mean, it's just that -- it's not
21 that it's totally inaccurate. I just think it's like
22 journalist writing, had to have seen it. It doesn't
23 mean they saw it. I just think that if it was in
24 front of them, they would have seen it.
25 Q So she told you that -- you told her that

1 the photograph was in the houses -- houses?
2 A Yes. I know he had it in New York on his
3 desk. I know he had it in Palm Beach. I know he had
4 it in the Caribbean. And I don't know if he had it
5 in New Mexico. I can't remember New Mexico. Maybe.
6 Q Where in Palm Beach was the photograph?
7 A The massage room.
8 Q Was that -- you did not say that they --
9 it was all over the houses?
10 A Correct. All over the houses would imply
11 that it's everywhere in the house, so...
12 Q You did not say that Andrew and Clinton
13 had to have seen the photograph?
14 A Correct. I -- it was more of a, if they
15 were in front of it, they would have seen it, kind of
16 a thing. I'm not saying it right. But it wasn't,
17 like, had to have seen it.
18 Q All right. What's the next statement that
19 you put a check by?
20 A I'm sorry, excuse me. My kids shared a
21 beautiful cough with me again.
22 "I spent four years as a millionaire's
23 personal masseuse."
24 Q What is inaccurate about that statement?
25 A We now know, according to the timelines

1 that Mar-a-Lago was able to provide for us, that it
2 was not four years.
3 Q How many years was it?
4 A More like 2-1/2, I think, if I'm right, or
5 two. I'm sorry, I'm really bad at math. But yes,
6 the two period.
7 Q What's the next statement that you have
8 put a check by?
9 A "I was a pedophile's dream." I think she
10 took that out of context and made that her own little
11 headline.
12 Q Did you say that to her?
13 A I said something along the line like, I --
14 the -- the pedos loved me because I would do
15 everything that they wanted for them. But do I think
16 that -- yeah, I -- I know she made that line up
17 herself, the pedos -- pedophile's dream.
18 Q What's the next one you put a check by?
19 A I put a question mark next to the next
20 one. It says, "Three years later she was reunited
21 with her family." I don't know what that pertains
22 to. I don't know what timeline that means.
23 Q Was there a period of three years where
24 you were not with your family?
25 A There's been longer periods than that

1 that -- when I wasn't with my family. That's what I
2 mean, I don't understand where that comes from.
3 "Three years later she was reunited with her family."
4 Q Prior to 2002, was there a period of three
5 years where you were not with your family?
6 A No.
7 Q Okay. Did you say to Sharon Churcher,
8 three years later, she was reunited with her family?
9 A That's what I don't understand. I don't
10 even know what that time periods pertains to.
11 Q Do you recall saying that to Sharon
12 Churcher?
13 A No.
14 Q What's the next one you put a check by?
15 A "After about two years he started to ask
16 me to entertain his friends."
17 Q What's wrong with that statement?
18 A It wasn't two years. I don't know where
19 she got that from.
20 Q Okay. How long was it?
21 A Like, I can't give you an exact time
22 period, but it wasn't right in the beginning. It was
23 after my training, or so to speak training. So, I
24 mean, my best guesstimate would be anywhere between
25 four to six months.

1 Q So you did not say to Sharon Churcher,
2 "After about two years he asked me to entertain his
3 friends"?
4 A Correct.
5 Q What's the next one you put a check by?
6 A That's it. That's all I put a checkmark
7 next to.
8 Q So the rest of these are absolutely
9 accurate?
10 A Nothing a journalist writes is absolutely
11 accurate, but it's -- it sounds accurate, yes.
12 Q Do you recall Jeffrey Epstein saying to
13 you, "I've got a good friend and I need you to fly to
14 the island to entertain him, massage him and make him
15 feel how you make me feel"?
16 MS. MCCAWLEY: Objection.
17 Go ahead.
18 A I do remember him saying that, and I think
19 that's more of a general- -- generalization for all
20 the times that I was sent to the -- where is this --
21 the island to entertain people. And that would be a
22 quote that she made but from my words saying that's
23 what he said to me when I had to go be with these
24 people that he sent me to.
25 Q (BY MS. MENNINGER) Did you say that

1 sentence to her?

2 MS. MCCAWLEY: Objection.

3 A I -- I can't remember. Like I said, I

4 think it's more of a generalization.

5 Q (BY MS. MENNINGER) Did you meet Al Gore?

6 A Yes.

7 Q Did you meet Heidi Klum?

8 A Yes.

9 Q Did you meet Naomi Campbell?

10 A Yes.

11 Q Did you go on a six-week trip with Epstein

12 in 2001?

13 A Yeah. Yes. Sorry.

14 Q When in 2001 did you go on a six-week trip

15 with him?

16 A I don't remember exactly when it was, but

17 it's that -- it's the one where we went to Tangier,

18 Morocco, England. I can't remember where else we

19 went. France.

20 Q Did the FBI tell you that Epstein had

21 hidden cameras watching you the entire time, even

22 when you were in the bathroom?

23 A Yes.

24 Q Did the FBI tell you "Everything he did

25 was illegal because I was under age"?

1 A Yes.
2 Q Who in the FBI told you that?
3 A Whichever agent I was talking to.
4 Q Which agent were you talking to?
5 A I can't remember. I know I was talking to
6 Jason Richards, and there was a girl, I think -- I
7 want -- I want to say her name was Christina Pryor,
8 just off the top of my head. And then I think there
9 was two other agents actually at the consulate
10 building. I don't remember their names. Very hazy.
11 Q When was this conversation with the FBI?
12 A After Sharon printed the articles, the
13 first articles that came out. I don't know how many
14 she printed, but when the first articles came out,
15 after that the FBI contacted me.
16 Q And was the statement that the FBI told
17 you "Everything he did was illegal because I was
18 under age," in response to you telling them that you
19 were age 15 when you met Jeffrey?
20 MS. MCCAWLEY: Objection.
21 A Well, that was the closest proximity I had
22 to go off of.
23 Q (BY MS. MENNINGER) Okay.
24 A So, yes. Although I still was under age,
25 I mean, even if I was 16 and 17.

1 Q Okay. And then if you could do the last
2 page, same way; a check by anything that's not
3 absolutely accurate.
4 MS. MCCAWLEY: Okay. I'm going to object
5 to this as the last page has no identifier of time or
6 source on it.
7 A Okay. I'm ready.
8 Q (BY MS. MENNINGER) All right. Which ones
9 are inaccurate?
10 A The first one is, "Virginia got a
11 part-time job as a changing room assistant." I was a
12 full-time person there. Sorry.
13 Q Okay. So did you say that to Sharon?
14 A Again, I don't remember that exact
15 conversation, but I know it was a full-time job,
16 and -- I mean, full-time as in the, you know, the 9
17 to 5 or whatever hours it was, so it wasn't
18 part-time. I don't remember the exact conversation
19 that we had.
20 Q Okay. What's the next thing you put a
21 check by?
22 A I put a question mark next to, "Another
23 lady led me into Jeffrey's bedroom. The lady walked
24 me straight through into the massage room."
25 I have no idea what circumstance that

1 pertains to. Again, I don't know what that means. I
2 don't even know what other lady she's talking about.
3 So...
4 Q So you don't recall saying that to Sharon
5 Churcher?
6 A Correct. I don't even know what it means.
7 Q Okay. What's the next one you have a
8 check by?
9 A "Afterwards, she was given two $100 bills
10 and told to return the next day. That was the
11 beginning of the four years she spent with Epstein."
12 Q All right. What's wrong about that
13 statement?
14 A Well, again, I just want to say that the
15 four years was inaccurate based upon memory and not
16 an actual timeline that we were able to get.
17 Q Did you say that to Sharon Churcher, that
18 it was four years?
19 A I don't know if I said that to her or --
20 oh, yeah, did I tell her it was four years? Yes, I
21 did. I'm sorry.
22 Q Okay. What else did you put a check by?
23 A Well, this one is a question mark again.
24 "Radar online has obtained exclusive diary entries of
25 a Teen Sex Slave."

1 It wasn't really a diary. It was, like, I
2 don't know how many pages of something that I wrote,
3 and Sharon used it, so...
4 Q Did you tell Sharon it was your diary
5 entry?
6 A She knew it wasn't a diary entry. No.
7 Q Okay. Were you a teen sex slave?
8 A Yes.
9 Q What's the next one you have a checkmark
10 by?
11 A "I also saw Prince Andrew at a Ranch in
12 New Mexico."
13 Q Did you tell that to Sharon Churcher?
14 A No. And I think it's a mistake. Maybe
15 she meant somewhere else, but because we had been
16 talking about so much, maybe she just put New Mexico.
17 I don't think Sharon intentionally lied on any of
18 these. I just -- I think we talked so much over a
19 period of a week, and then after that we had phone
20 conversations, and so on and so forth, that some of
21 the information just got misheard or mishandled, or
22 whatever.
23 Q And what was printed was inaccurate?
24 A Was that printed? I don't -- I don't
25 remember reading that in the papers, but if it was

1 printed it's inaccurate.

2 Q Do you recall reading any of the ones that

3 you put a checkmark by in the papers?

4 A There's been so much printed, it's hard

5 for me to remember. I mean, yes, it does sound like

6 stuff I read before.

7 Q When you spoke with Sharon Churcher, you

8 agreed to waive your anonymity, right?

9 A I did.

10 Q Why did you agree to do that?

11 A I felt it was time for me to tell my

12 story. I felt it was a good time for me to come

13 forward. I had done so much healing, and I thought

14 that it would be good for other people to hear what's

15 going on, how it's happening, how vulnerable other

16 girls can be and not even know the damage that it

17 causes later in life. And I just thought it would be

18 the right thing to do to come forward.

19 Q You authorized her to publish your name?

20 A I did.

21 Q And your photograph?

22 A Yes.

23 Q In 2011?

24 A I think that was the year, yes.

25 Q You posed for photographs with her,

1 I, VIRGINIA GIUFFRE, do hereby certify that
2 I have read the foregoing transcript and that the
3 same and accompanying amendment sheets, if any,
4 constitute a true and complete record of my
5 testimony.
6 ____________________________
Signature of Deponent
7
( ) No amendments
8 ( ) Amendments attached
9
10 Acknowledged before me this _______ day
11 of _____________, 20___.
12
13
Notary Public: ___________________
14
My Commission Expires: ___________
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Seal:
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PJH
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1 STATE OF COLORADO)
2) ss. REPORTER'S CERTIFICATE
3 COUNTY OF DENVER)
4 I, Pamela J. Hansen, do hereby certify that
5 I am a Registered Professional Reporter and Notary
6 Public within the State of Colorado; that previous to
7 the commencement of the examination, the deponent was
8 duly sworn to testify to the truth.
9 I further certify that this deposition was
10 taken in shorthand by me at the time and place herein
11 set forth, that it was thereafter reduced to
12 typewritten form, and that the foregoing constitutes
13 a true and correct transcript.
14 I further certify that I am not related to,
15 employed by, nor of counsel for any of the parties or
16 attorneys herein, nor otherwise interested in the
17 result of the within action.
18 In witness whereof, I have affixed my
19 signature this 23rd day of November, 2016.
20 My commission expires September 3, 2018.
21
22 ______________________________
Pamela J. Hansen, CRR, RPR, RMR
23 216 - 16th Street, Suite 600
Denver, Colorado 80202
24
25

Epstein did invite two young brunettes to a dinner which he gave on his Caribbean island for Mr. Clinton shortly after he left office.

I'd have been about 17 at the time. I flew to the Caribbean with Jeffrey and then Ghislaine Maxwell went to pick up Bill in a huge black helicopter that Jeffrey had bought her.

I remember she was very excited because she got her license around the first year we met.

I used to get frightened flying with her but Bill had the secret service with him and I remember him talking about what a good job she did.

I don't remember seeing Bill again on the trip but I assume Ghislaine flew him back.

Virginia disclosed that Mr. Clinton's vice-president Al Gore and his wife, Tipper, were also guests of Epstein on his island.

Virginia said that yet another American liberal icon, Senator George Mitchell, frequently visited Epstein's New York residence. Mr. Mitchell, aged 77, was very close to Jeffrey, Virginia recalled.

I also met Naomi Campbell at a birthday party of hers on a yacht in the South of France. She is a friend of Ghislaine's but she was a real bitch to me.

Donald Trump was also a good friend of Jeffrey's. He didn't partake in any sex with any of us but he flirted with me. He'd laugh and tell Jeffrey, 'you've got the life.'

Ghislaine took nude picture of me lying naked in a hammock, posed with my legs open, a bit provocatively that I gave to Jeffrey for his birthday.

The hammock photo was "all over the houses" and Bill Clinton and Andrew "had to have seen" it.

I spent four years as millionaire's personal masseuse.

I was living on the streets, beaten up and slept with at least two older men in return for food.

While on the streets, I slept with men for money.

I was a paedophile's dream.

Three years later she was reunited with her family.

After about two years, he started to ask me to 'entertain' his friends.

She recalls he said "I've got a good friend and I need you to fly to the island to entertain him, massage him and make him feel how you make me feel."

The way it usually worked was I'd been sent to meet a man on the private island Jeffrey owned in the Caribbean, or at his ranch in New Mexico, which was really isolated.

I met famous friends of his such as Al Gore and Heidi Klum and Naomi Campbell.

She was, she says, delighted when Epstein invited her to accompany him on a six-week trip in 2001.

FBI told me that Epstein had hidden cameras watching me the entire time even when I was in the bathroom. I was so embarrassed.

The FBI told me everything he did was illegal because I was under age.

Virginia got a part-time job as a changing room assistant.

I told Ghislaine I wanted to become a masseuse and she said she worked for a very wealthy gentleman who was looking for a traveling masseuse. I'd get training and be paid well.

Another lady led me into Jeffrey's bedroom. The lady walked me straight through into the massage room.

Afterwards, she was given two $100 bills and told to return the next day. That was the beginning of the four years she spent with Epstein.

Radar Online has obtained exclusive "Diary entries" of "Teen Sex Slave".

I led Prince Andrew into the upstairs bathroom next to the room I was staying in.

I was doing my best trying to put on a good show for him by slowly undressing and started to pour a bath.

He was caressing every part of my naked body and filling my head with endless compliments about my blossoming figure.

He paid careful attention to my toes and was licking them.

I also saw Prince Andrew at the Ranch in New Mexico.

EXHIBIT QQ

To: sharon churcher[sharon.churcher@mailonsunday.co.uk]
From: Virginia Giuffre
Sent: Fri 5/20/2011 2:20:09 AM
Importance: Normal
Subject: How ya doing??
Received: Fri 5/20/2011 2:20:09 AM

Hi Buddy,
I hope you are stopping to smell the daffodils once in a while and having a good day!! I am so excited today because I can go sign with an agent as my contract is finished with "Mail On Sunday"...YEAH!! Sandra and I have been working really hard to get me ready for my trip to the U.S in a few weeks and I was wondering if I could use your advice again. She has got an INT'L agent who is interested in speaking with me and I don't want to say "Yes" to the first bite because I'm not sure what to look for in an agent. What could you recommend that I do? I will send Jarred and Irene (your recommended agents) a copy of the synopsis and sample chapters but how do I choose the right one for "The Story"? Do you know anyone else that might be interested in this as well? If so, i am keen on speaking with anyone who might be. I am soooooooo excited about this and will keep you updated with the progressing events. When I am in New York we have to meet up for some city shopping and take the kids to Central Park to see the Zoo, given there will be no masturbating kangaroo's for you to make friends with, but who know's? I am looking forward to showing Robbie around and he's got some family out there as well we have to catch up with. Such busy times, but I'm loving it!! Anyways I hope your taking care and catch me up on all your fun times!!

Take care,
Jenna

EXHIBIT RR

Agren Blando Court Reporting & Video, Inc.

IN THE UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF NEW YORK

Civil Action No. 15-cv-07433-RWS

CONFIDENTIAL VIDEOTAPED DEPOSITION OF
VIRGINIA GIUFFRE May 3, 2016

VIRGINIA L. GIUFFRE,

Plaintiff,

v.

GHISLAINE MAXWELL,

Defendant.

APPEARANCES:

FAMER, JAFFE, WEISSING, EDWARDS, FISTOS & LEHRMAN, P.L.
By Brad Edwards, Esq.
425 N. Andrews Avenue
Suite 2
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Phone: 954.524.2820
brad@pathtojustice.com
Appearing on behalf of the Plaintiff

BOIES, SCHILLER & FLEXNER LLP
By Sigrid S. McCawley, Esq. (For Portion)
401 East Las Olas Boulevard
Suite 1200
Fort Lauderdale, FL 33301-2211
Phone: 954.356.0011
smccawley@bsfllp.com
Appearing on behalf of the Plaintiff

1 APPEARANCES: (Continued)

2 HADDON, MORGAN AND FORMAN, P.C.
By Laura A. Menninger, Esq.
3 Jeffrey S. Pagliuca, Esq.
150 East 10th Avenue
4 Denver, CO 80203
Phone: 303.831.7364
5 lmenninger@hmflaw.com
jpagliuca@hmflaw.com
6 Appearing on behalf of the
Defendant
7
Also Present:
8 Brenda Rodriguez, Paralegal
Nicholas F. Borgia, CLVS Videographer
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1 Pursuant to Notice and the Federal Rules
2 of Civil Procedure, the VIDEOTAPED DEPOSITION OF
3 VIRGINIA GIUFFRE, called by Defendant, was taken on
4 Tuesday, May 3, 2016, commencing at 9:00 a.m., at 150
5 East 10th Avenue, Denver, Colorado, before Kelly A.
6 Mackereth, Certified Shorthand Reporter, Registered
7 Professional Reporter, Certified Realtime Reporter
8 and Notary Public within Colorado.
9
* * * * * * *
10 I N D E X
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1 INDEX OF EXHIBITS

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1 Some names have been changed in order to protect
2 other people.
3 Q (BY MS. MENNINGER) Protect their privacy?
4 A Protect their privacy, yeah, I would say,
5 just not getting them involved in, if this were to
6 ever go public.
7 Q Well, again, without rereading the whole
8 manuscript --
9 A Reading it, yeah. I'm trying to see if I
10 can -- see something in here.
11 Q Let me narrow my question and maybe that
12 will help.
13 A Yes.
14 Q Is there anything -- well, first of all,
15 did you author that entire manuscript?
16 A Yes, I did.
17 Q Did anyone else author part of that
18 manuscript?
19 A Do you mean did anyone else write this
20 with me?
21 Q Right.
22 A No.
23 Q That's all your writing?
24 A This is my writing.
25 Q Okay. To the best of your recollection,

1 as you sit here right now, is there anything in that
2 manuscript about Ghislaine Maxwell that is untrue?
3 A I don't believe so. Like I said, there is
4 a lot of stuff that I actually have left out of here.
5 Q Um-hum.
6 A So there is a lot more information I could
7 put in there. But as far as Ghislaine Maxwell goes,
8 I would like to say that there is 99.9 percent of it
9 would be to the correct knowledge.
10 Q All right. Is there anything that you --
11 and I understand you're doing this from memory. Is
12 there anything that you recall, as you're sitting
13 here today, about Ghislaine Maxwell that is contained
14 in that manuscript, that is not true?
15 A You know, I haven't read this in a very
16 long time. I don't believe that there's anything in
17 here about Ghislaine Maxwell that is not true.
18 MR. EDWARDS: I'd just ask, Counsel, if
19 you have anything specific to show her about
20 Ghislaine Maxwell --
21 MS. MENNINGER: I'll ask questions.
22 MR. EDWARDS: -- I'll have her look at it.
23 MS. MENNINGER: I'll ask questions.
24 MR. EDWARDS: I know, but I want the
25 record clear that if she hasn't read it in a long

1 I, VIRGINIA GIUFFRE, do hereby certify that
2 I have read the foregoing transcript and that the
3 same and accompanying amendment sheets, if any,
4 constitute a true and complete record of my
5 testimony.
6
7
8
____
9 Signature of Deponent
( ) No Amendments
10 ( ) Amendments Attached
11 Acknowledged before me this
12 _____ day of ______________, 2016.
13
14 Notary Public: ________________________
15 Address: _____________________________
16 _____________________________
17 My commission expires _________________
18 Seal:
19
20
21 KAM
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25

1 STATE OF COLORADO)

2) ss. REPORTER'S CERTIFICATE

3 COUNTY OF DENVER)

4 I, Kelly A. Mackereth, do hereby certify

5 that I am a Registered Professional Reporter and

6 Notary Public within the State of Colorado; that

7 previous to the commencement of the examination, the

8 deponent was duly sworn to testify to the truth.

9 I further certify that this deposition was

10 taken in shorthand by me at the time and place herein

11 set forth, that it was thereafter reduced to

12 typewritten form, and that the foregoing constitutes

13 a true and correct transcript.

14 I further certify that I am not related to,

15 employed by, nor of counsel for any of the parties or

16 attorneys herein, nor otherwise interested in the

17 result of the within action.

18 In witness whereof, I have affixed my

19 signature this 11th day of May, 2016.

20 My commission expires April 21, 2019.

21

22 ____________________________

Kelly A. Mackereth, CRR, RPR, CSR

23 216 - 16th Street, Suite 600

Denver, Colorado 80202

24

25

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

--X

VIRGINIA GIUFFRE,

Giuffre,

15 Civ. 7433

-against-

SEALED OPINION

GHISLAINE MAXWELL,

Maxwell.

--X

A P P E A R A N C E S:

Counsel for Giuffre

BOIES, SCHILLER & FLEXNER LLP
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Meredith L. Schultz, Esq.

Counsel for Maxwell

HADDON, MORGAN AND FOREMAN, P.C.
150 East Tenth Avenue
Denver, CO 80203
By: Laura A. Menninger, Esq.
Jeffrey S. Pagliuca, Esq.

Sweet, D.J.

The defendant Ghislaine Maxwell ("Maxwell" or the "Maxwell") has moved pursuant to Rule 56, Fed. R. Civ. P., for summary judgment dismissing the complaint of plaintiff Virginia L. Giuffre ("Giuffre" or the "Giuffre") alleging defamation. Upon the facts and conclusions set forth below, the motion is denied.

I. Prior Proceedings

Since the filing of the complaint on September 21, 2015, setting forth Giuffre's claim of defamation by Maxwell, this action has been vigorously litigated, as demonstrated by the 704 docket entries as of March 8, 2017. At issue is the truth or falsity of a January 2015 statement issued by Maxwell. Discovery has proceeded, a joint pretrial order has been filed, and the action is set for trial on May 15, 2017.

The instant motion was heard and marked fully submitted on February 16, 2017.

II. The Facts

The facts have been set forth in Maxwell's Memorandum of Law in Support of Maxwell's Motion for Summary Judgment, Southern District of New York, Local Rule 56.1; Giuffre's Statement of Contested Facts and Giuffre's Undisputed Facts; and Maxwell's Reply to Giuffre's Statement of Contested Facts and Giuffre's Undisputed Facts pursuant to Local Civil Rule 56.1. They are not in dispute except as noted below.

1. In early 2011, Giuffre, in two British tabloid interviews, made numerous false and defamatory allegations against Maxwell. In the articles, Giuffre made no direct allegations that Maxwell was involved in any improper conduct with Jeffrey Epstein ("Epstein"), who had pleaded guilty in 2007 to procuring a minor for prostitution. Nonetheless, Giuffre suggested that Maxwell worked with Epstein and may have known about the crime for which he was convicted.

Giuffre has denied that the allegations she made against Maxwell were false and defamatory. She noted that she did give an interview to journalist, Sharon Churcher ("Churcher"), in which she described Maxwell's role as someone

who recruited or facilitated the recruitment of young females for Epstein, that she was interviewed by the FBI in 2011, and that she discussed Maxwell's involvement in the sexual abuse.

2. In the articles, Giuffre alleged she had sex with Prince Andrew, "a well-known businessman," a "world-renowned scientist," a "respected liberal politician," and a "foreign head of state."

Giuffre did not contest this statement but noted it is irrelevant.

3. In response to the allegations, Maxwell's British attorney, working with Ross Gow ("Gow"), Maxwell's public relations representative, issued a statement on March 9, 2011, denying "the various allegations about [Maxwell] that have appeared recently in the media. These allegations are all entirely false."

Giuffre has denied that Maxwell's British attorney, Philip Barden ("Barden"), "issued a statement," noting that it appears to have the contact "Gow" and a reference to Devonshire Solicitors.

4. The March 9, 2011 statement read in full:

Statement on Behalf of Ghislaine Maxwell

By Devonshires Solicitors, PRNE Wednesday, March 9, 2011

London, March 10, 2011 - Ghislaine Maxwell denies the various allegations about her that have appeared recently in the media. *These allegations are all entirely false.*

It is unacceptable that letters sent by Maxwell's legal representatives to certain newspapers pointing out the truth and asking for the allegations to be withdrawn have simply been ignored.

In the circumstances, *Maxwell is now proceeding to take legal action against those newspapers.*

"I understand newspapers need stories to sell copies. It is well known that certain newspapers live by the adage, "why let the truth get in the way of a good story." However, *the allegations made against me are abhorrent and entirely untrue* and I ask that they stop," said Ghislaine Maxwell.

"A number of newspapers have shown a complete lack of accuracy in their reporting of this story and a failure to carry out the most elementary investigation or any real due diligence. I am now taking action to clear my name," she said.

Media contact:

Ross Gow
Acuity Reputation
Tel: +44-203-008-7790
Mob: +44-7778-755-251
Email: ross@acuityreputation.com
Media contact: Ross Gow, Acuity Reputation, Tel: +44-203-008-7790,

Mob: +44-7778-755-251, Email: ross at acuityreputation.com

Giuffre has noted it is unclear if the original included the italics that are inserted above.

5. In 2008, two alleged victims of Epstein brought an action under the Crime Victims' Rights Act (the "CVRA Action") against the United States Government purporting to challenge Epstein's plea agreement. They alleged the Government violated their CVRA rights by entering into the agreement.

6. Giuffre moved to join the CVRA Action on December 30, 2014, claiming she, too, had her CVRA rights violated by the Government. On January 1, 2015, Giuffre filed a "corrected" joinder motion. *See Jane Doe 1 and Jane Doe 2 v. United States*, No. 9:08-cv-80736-KAM, Docket No. 280 (S.D. Fla. Jan. 2, 2015) ("CVRA Joinder Mot."). Giuffre's joinder motion in this unrelated action included gratuitous and "lurid" accusations.

Giuffre has denied the final sentence fragment.

7. The issue presented in the joinder motion was narrow: whether Giuffre should be permitted to join the CVRA

Action as a party under Federal Rule of Civil Procedure 21, specifically, whether she was a "known victim[] of Mr. Epstein and the Government owed them CVRA duties." *Jane Doe 1 and Jane Doe 2 v. United States*, No. 9:08-cv-80736-KAM, Docket No. 324 (S.D. Fla. Apr. 7, 2015) ("CVRA Mot. Op.") at 5. Yet, "the bulk of the [motion] consists of copious factual details that [Ms. Giuffre] and [her co-movant] 'would prove . . . if allowed to join.'" *Id.* Giuffre gratuitously included provocative and "lurid details" of her alleged sexual activities as an alleged victim of sexual trafficking.

Giuffre has denied that the issues presented in her joinder motion were narrow and has noted that the issues presented by the joinder motion and related pleadings were multiple and complex, requiring numerous details about Giuffre's sexual abuse and the listing of the perpetrators of her abuse. In a pleading explaining why the motion was filed, *see Jane Doe 1 and Jane Doe 2 v. United States*, No. 9:08-cv-80736-KAM, Docket No. 291 at 18-26 & n.17 (S.D. Fla. Jan. 21, 2015), Giuffre's lawyers specifically listed nine separate reasons why Jane Doe 3's allegations that Alan Dershowitz ("Dershowitz") had sexually abused her were relevant to the case and appropriately included in the relevant filings. Additionally, Giuffre states that Judge

Marra's ruling concluded that certain allegations were not necessary "at this juncture in the proceedings," adding that "Jane Doe 3 is free to reassert these factual details through proper evidentiary proof, should Petitioners demonstrate a good faith basis for believing that such details are pertinent to a matter presented for the Court's consideration." CVRA Mot. Op. at 5-6. Giuffre notes that the CVRA litigation continues and no trial has been held as of the filing of this motion so that the extent to which these factual details will be used at trial has not yet been determined. *See* Docket Sheet, *Jane Doe 1 and Jane Doe 2 v. United States*, No. 9:08-cv-80736-KAM.

8. At the time they filed the motion, Giuffre and her lawyers knew that the media had been following the Epstein criminal case and the CVRA Action. While they deliberately filed the motion without disclosing Giuffre's name, claiming the need for privacy and secrecy, they made no attempt to file the motion under seal. Quite the contrary, they filed the motion publicly.

Giuffre has noted her denial as set forth to Statement 7 above.

9. As the district court noted in ruling on the joinder motion, Giuffre "name[d] several individuals, and she offers details about the type of sex acts performed and where they took place." CVRA Mot. Op. at 5. The court ruled that "these lurid details are unnecessary," explaining that "[t]he factual details regarding whom and where the Jane Does engaged in sexual activities are immaterial and impertinent . . . , especially considering that these details involve nonparties who are not related to the respondent Government." *Id.* Accordingly, "[t]hese unnecessary details shall be stricken." *Id.* The court then struck all Giuffre's factual allegations relating to her alleged sexual activities and her allegations of misconduct by non-parties. *Id.* at 6. The court said the striking of the "lurid details" was a sanction for Giuffre's improper inclusion of them in the motion. *Id.* at 7.

Giuffre has noted her denial as set forth in Statement 7 above.

10. The district court in the CVRA Action found not only that the "lurid details" were unnecessary but also that the joinder motion itself was "entirely unnecessary." *Id.* at 7. Giuffre and her lawyers knew the motion with all its "lurid

details" was unnecessary because the motion itself recognized that she would be able to participate as a fact witness to achieve the same result she sought as a party. The court denied Giuffre's joinder motion. *Id.* at 10.

Giuffre has noted her denial as set forth in Statement 7 above.

11. One of the non-parties Giuffre "named" repeatedly in the joinder motion was Maxwell. According to the "lurid details" of Giuffre included in the motion, Maxwell personally was involved in a "sexual abuse and sex trafficking scheme" created by Epstein:

- Maxwell "approached" Giuffre in 1999 when Giuffre was "fifteen years old" to recruit her into the scheme.
- Maxwell was "one of the main women" Epstein used to "procure under-aged girls for sexual activities."
- Maxwell was a "primary co-conspirator" with Epstein in his scheme.
- She "persuaded" Giuffre to go to Epstein's mansion "in a fashion very similar to the manner in which Epstein and his other co-conspirators coerced dozens of other children."

- At the mansion, when Giuffre began giving Epstein a massage, he and Ms. Maxwell "turned it into a sexual encounter."

- Epstein "with the assistance of" Maxwell "converted [Giuffre] into . . . a 'sex slave.'" *Id.* Giuffre was a "sex slave" from "about 1999 through 2002."

- Maxwell also was a "co-conspirator in Epstein's sexual abuse."

- Maxwell "appreciated the immunity" she acquired under Epstein's plea agreement, because the immunity protected her from prosecution "for the crimes she committed in Florida."

- Maxwell "participat[ed] in the sexual abuse of [Giuffre] and others."

- Maxwell "took numerous sexually explicit pictures of underage girls involved in sexual activities, including [Giuffre]." *Id.* She shared the photos with Epstein.

- As part of her "role in Epstein's sexual abuse ring," Maxwell "connect[ed]" Epstein with "powerful individuals" so that Epstein could traffic Giuffre to these persons.

- Giuffre was "forced to have sexual relations" with Prince Andrew in "[Maxwell's] apartment" in London. Maxwell "facilitated" Giuffre's sex with Prince Andrew "by acting as a 'madame' for Epstein."

- Maxwell "assist[ed] in internationally trafficking" Giuffre and "numerous other young girls for sexual purposes."

- Giuffre was "forced" to watch Epstein, Maxwell and others "engage in illegal sexual acts with dozens of underage girls."

See CVRA Joinder Mot.

Giuffre has denied the reference to "lurid details" and has noted her denial as set forth in Statements 6 and 7 above and that the testimony from numerous witnesses has corroborated the statements Giuffre made in her joinder motion:

- Johanna Sjoberg ("Sjoberg") May 18, 2016 Dep. Tr. at 8-9, 13, 33-35, 142-143.
- Anthony Figueroa ("Figueroa") June 24, 2016 Dep. Tr. Vol. 1 at 96-97 and 103.
- Rinaldo Rizzo ("Rizzo") June 10, 2016 Dep. Tr. at 52-60.
- Lynn Miller's May 24, 2016 Dep. Tr. at 115.
- Joseph Recarey's June 21, 2016 Dep. Tr. at 29-30.
- David Rodgers' June 3, 2016 Dep. Tr. at 18, 34-36.
- Excerpted Rodgers Dep. Ex. 1 at flight #s 1433-1434, 1444-1446, 1464-1470, 1478-1480, 1490-1491, 1506, 1525-1526, 1528, 1570, and 1589.
- NadiaMarcinkova ("Marcinkova") Dep. Tr. at 10:18-21; 12:11-15; etc.

- Sarah Kellen ("Kellen") Dep. Tr. at 15:13-18; 20:12-16; etc.
- Epstein Dep. Tr. at 116:10-15; 117:18-118:10; etc.
- Juan Alessi ("Alessi") Dep. Tr. At 28, 52-54.
- U.S. Attorney Victim Notification Letter GIUFFRE002216-002218.
- July 2001 New York Presbyterian Hospital Records GIUFFRE003258-003290.
- Judith Lightfoot psychological records GIUFFRE005431-005438.
- Message Pad evidencing Maxwell arranging to have underage girls and young women come to Epstein's home GIUFFRE001386-001571.
- "Black Book" in which Maxwell and other household staff maintained a roster of underage girls including [REDACTED], [REDACTED], and [REDACTED], who were minors at the time the Palm Beach Police's Investigation of Jeffrey Epstein GIUFFRE001573-00669.

- Sex Slave books Epstein ordered from Amazon.com at GIUFFRE006581.
- The folder Maxwell sent to Thailand with Giuffre bearing Maxwell's phone number GIUFFRE003191-003192.
- The Palm Beach Police Report showing that Epstein used women and girls to collect underage girls for his abuse GIUFFRE005614-005700.
- Epstein's Flight Logs showing that Maxwell flew with Giuffre 23 times GIUFFRE007055-007161.

12. In the joinder motion, Giuffre also alleged she was "forced" to have sex with Dershowitz, "model scout" Jean Luc Brunel, and "many other powerful men, including numerous prominent American politicians, powerful business executives, foreign presidents, a well-known Prime Minister, and other world leaders." CVRA Joinder Mot. at 5-6.

Giuffre has noted her denial as set forth in Statements 7 and 11 above.

13. Giuffre said after serving for four years as a "sex slave," she "managed to escape to a foreign country and hide out from Epstein and his co-conspirators for years." *Id.* at 3.

Giuffre has admitted making this statement and has noted since discovered evidence that indicates she was mistaken on the exact timeframe of her abuse and was with Maxwell and Epstein from the years 2000-2002.

14. Giuffre suggested the Government was part of Epstein's "conspiracy" when it "secretly" negotiated a non-prosecution agreement ("NPA") with Epstein precluding federal prosecution of Epstein and his "co-conspirators." *Id.* at 6. The Government's secrecy, Giuffre alleged, was motivated by its fear that Giuffre would raise "powerful objections" to the agreement that would have "shed tremendous public light" on Epstein and other powerful individuals. *Id.* at 6-7.

Giuffre has denied that she suggested that the Government was part of Epstein's conspiracy to commit sex offenses and has noted that the CVRA Action deals with whether the Government failed in their responsibilities to the victims

to inform the victims that the Government was working out an NPA, that the Government did fail to so inform the victims, and that it intentionally did not inform the victims because the expected serious objection from many of the victims might prevent the Government from finalizing the NPA with Epstein.

15. The other "Jane Doe" who joined Giuffre's motion who alleged she was sexually abused on "many occasions" by Epstein was unable to corroborate any of Giuffre's allegations.

Giuffre has denied the statement and noted that the other Jane Doe could corroborate many of Giuffre's allegations based on a similar pattern of abuse by Epstein that she suffered, that she did not know Giuffre, and further has noted [REDACTED], who was deposed in this case, and who was a minor, corroborates the same pattern of abuse.

16. In her multiple and lengthy consensual interviews with Churcher three years earlier, Giuffre told Churcher of virtually none of the details she described in the joinder motion.

Giuffre has denied the statement and noted that absence of any citation or evidence on this point and that the statement here is knowingly false based on the articles and Giuffre's deposition.

17. As Giuffre and her lawyers expected, before Judge Marra in the CVRA Action could strike the "lurid details" of Giuffre's allegations in the joinder motion, members of the media obtained copies of the motion.

Giuffre has denied the statement as set forth in Statement 7 above.

18. At the direction of Barden, on January 2, 2015, Gow sent to numerous representatives of British media organizations an email containing "a quotable statement on behalf of Maxwell" (the "Press Release"). The email was sent to more than six and probably fewer than 30 media representatives. It was not sent to non-media representatives.

Giuffre has denied that "[a]t Mr. Barden's direction, on January [2], 2015, Gow sent to numerous representatives of British media organizations an email containing 'a quotable

statement on behalf of Maxwell'" and has noted that Gow produced an email exchange he had with Maxwell in which Maxwell directs Gow to send the Press Release as follows:

From: G Maxwell <GMax1@ellmax.com>
Date: Fri, 2 Jan 2015 20:14:53 +0000
To: Ross Gow<ross@acuityreputation.com>
Cc: Philip Barden<philip.barden@devonshires.co.uk>
Subject: FW: URGENT - this is the statement

Jane Doe 3 is Virginia Roberts so not a new individual.

The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue.

The original allegations are not new and have been fully responded to and shown to be untrue

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschwitz is involved in having sexual relations with her, which he denies

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Giuffre has further noted that chronologically, this email comes at the end of various other email exchanges between Maxwell and Gow that discuss issuing a press release and that the subject line of this email that Maxwell wrote to Gow states "URGENT - this is the statement," thereby instructing Gow to release this statement to the press. Additionally, Giuffre notes that shortly after Maxwell sent this email to Gow directing him to release the Press Release, Gow distributed it to multiple media outlets, and that no email has been produced in which

Barden directed Gow to issue this press release. At his deposition, Gow authenticated this email and confirmed that Maxwell authorized the statement.

Giuffre has noted that the email and Gow's testimony establish that Maxwell, not Barden, directed and "command[ed]" Gow to publish the defamatory statement and the first sentence of the statement is false and the second sentence – "This email was sent to more than 6 and probably less than 30 media representatives" – omits the fact that not only did Gow admit to emailing the statement to the press, but he also read it to over 30 media representatives over the phone. Giuffre has denied the statement.

19. Among the media representatives who received the Press Release were Martin Robinson of the Daily Mail, P. Peachey of The Independent, Nick Sommerlad of The Mirror, David Brown of The Times, Nick Always and Jo-Anne Pugh of the BBC, and David Mercer of the Press Association. These representatives were selected based on their request after the joinder motion was filed—for a response from Maxwell to Giuffre's allegations in the motion.

Giuffre has denied the second sentence and has noted there is no record evidence that Gow (or anyone else) "selected" journalists "for a response," or that there was any selection process and that Gow testified that anyone who inquired received a reference to the Press Release.

20. The email to the media members read:

To Whom It May Concern,

Please find attached a quotable statement on behalf of Maxwell.

No further communication will be provided by her on this matter.

Thanks for your understanding.

Best Ross
Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts—so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told [sic] it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts [sic] that Alan Derschowitz [sic] is involved in having sexual relations with her, which he denies.

Ms. Roberts claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Giuffre has noted that the body text of the email that was sent to news media was cropped and the headings and metadata were omitted and has further noted the image of the email set forth below.

From: <ross@acuityreputation.com>
Date: 2 January 2015 at 20:38
Subject: Ghislaine Maxwell
To: Rossacuity Gow <ross@acuityreputation.com>
bcc: martin.robinson@mailonline.co.uk,
P.Peachey@independent.co.uk,
nick.sommerlad@mirror.co.uk,
david.brown@thetimes.co.uk,
nick.alway@bbc.co.uk,
jo-anne.pugh@bbc.co.uk

To Whom It May Concern,
Please find attached a quotable statement on behalf of Ms Maxwell.

No further communication will be provided by her on this matter.
Thanks for your understanding.
Best
Ross

Ross Gow
ACUITY Reputation

Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue.

Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms Roberts that Alan Derschowitz is involved in having sexual relations with her, which he denies.

Ms Roberts claims are obvious lies and should be treated as such and not publicised as news, as they are defamatory.

Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.

Sent from my BlackBerry® wireless device

21. Barden, who prepared the Press Release, did not intend it as a traditional press release solely to disseminate information to the media, and he intentionally did not pass it through a public relations firm, such as Gow's firm, Acuity Reputation.

Giuffre has denied the statement and has noted that the Barden Declaration should not be considered. She has further noted that there is no evidence to support any assertion of Barden's intent and that Maxwell gave the statement to Gow with instructions to publish it. Giuffre also has denied that the statement did not pass "through a public relations firm, such as Gow's firm, Acuity Reputation" and has noted that record documentary evidence and testimony establish that this statement was disseminated through Gow's firm, Acuity Reputation.

22. The Press Release served two purposes. First, Barden intended that it mitigate the harm to Maxwell's reputation from the press's republication of Giuffre's false allegations. He believed these ends could be accomplished by suggesting to the media that, among other things, they should subject Giuffre's allegations to inquiry and scrutiny. For example, he noted in the statement that Giuffre's allegations changed dramatically over time, suggesting that they are "obvious lies" and therefore should not be "publicized as news."

Giuffre has denied this statement and any statement of Barden's intent and that there was any "republication" by the

press as a matter of law as the press did not "republish" the press statement under New York law and that the allegations in the statement are "false," and cites to the evidence set forth in Statement 11 above.

Giuffre has further disputed that the harm to Maxwell's reputation could be mitigated by the media's inquiry into and scrutiny of Giuffre's allegations, because a deeper inquiry would only reveal additional evidence corroborating Giuffre's allegations, and has noted that the record does not establish who drafted the Press Release, and that it was ultimately Maxwell who "noted" anything because it is her statement and that she directed that it be sent to the media and public.

Giuffre has also disputed that her allegations have changed over time, "dramatically" or otherwise, that the Press Release "suggest[ed]" that her allegations are "obvious lies," because the Press Release affirmatively stated that her allegations are "obvious lies" there is no subtlety, suggestion, or statement of opinion here.

23. Barden intended the January 2015 statement to be "a shot across the bow" of the media, which he believed had been unduly eager to publish Giuffre's allegations without conducting any inquiry of their own. Accordingly, in the statement he repeatedly noted that Giuffre's allegations were "defamatory." In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Maxwell considered the publication of Giuffre's obviously false allegations and the legal indefensibility of their own conduct.

Giuffre has denied this statement and the statement that Barden repeatedly noted that Giuffre's allegations were "defamatory" as he did not "note" anything in the statement, nor does Maxwell cite to any record evidence that he did.

Giuffre further denies the sentence, "In this sense, the statement was intended as a cease and desist letter to the media-recipients, letting the media-recipients understand the seriousness with which Maxwell considered the publication of Giuffre's obviously false allegations and the legal indefensibility of their own conduct," as there is no record

evidence in support of this claim, and Maxwell has not cited any.

24. Consistent with his purposes as described by Maxwell, Gow's emails prefaced the statement with the following language: "Please find attached a quotable statement on behalf of Maxwell." The statement was intended to be a single, one-time only, comprehensive response, quoted in full, to Giuffre's December 30, 2014, allegations that would give the media Maxwell's response. The purpose of the prefatory statement was to inform the media-recipients of this intent.

Giuffre has disputed the statement and any statement relating to Barden's "purposes," as explained above, and has noted that Gow repeatedly issued this statement via email and over the phone for months on end and that Maxwell instructed them to publish it by telling them it was "quotable," and hired a press agent to distribute it to the press with the intent for the press to publish the Press Release.

25. Giuffre has engaged in numerous activities to bring attention to herself, to the prosecution and punishment of

wealthy individuals such as Epstein, and to her claimed interest of bringing light to the rights of victims of sexual abuse.

Giuffre has denied that she engaged in activities to bring attention to herself but has noted that she has taken action to aid in the prosecution of her abusers, and she seeks to bring light to the rights of victims of sexual abuse.

26. Giuffre created an organization, Victims Refuse Silence, Inc., a Florida corporation, directly related to her alleged experience as a victim of sexual abuse.

27. The "goal" of Victims Refuse Silence "was, and continues to be, to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual abuse." Toward this end, Giuffre has "dedicated her professional life to helping victims of sex trafficking."

28. Giuffre repeatedly has sought out media organizations to discuss her alleged experience as a victim of sexual abuse.

Giuffre has denied the statement and noted that she was approached by numerous media outlets and refused to speak to most of them, that media organizations sought her out and she did not seek them out.

29. Giuffre has written the manuscript of a book she has been trying to publish detailing her alleged experience as a victim of sexual abuse and of sex trafficking in Epstein's alleged "sex scheme."

Giuffre has stated that this mischaracterizes these activities, that it was against a backdrop of seeking psychological counseling that she drafted the manuscript as an "act of empowerment" and "a way of reframing and taking control over the narrative." Pl.'s Opp'n at 60. Giuffre notes that she ultimately decided not to publish the manuscript. *See* Giuffre Dep. Tr. 249:16-18; 250:19-251:3.

30. Giuffre was required by Interrogatory No. 6 to identify any false statements attributed to Maxwell that were "published globally, including within the Southern District of New York," as Giuffre alleged in Paragraph 9 of Count One of her complaint. In response, Giuffre identified the Press Release and

nine instances in which various news media published portions of the Press Release in news articles or broadcast stories.

Giuffre has denied this statement. There is no "republication" as a matter of law and Maxwell possesses the knowledge as to where the defamatory statements were published and Giuffre has noted that she has provided a sampling of Maxwell's defamatory statements published by the news media and that Maxwell caused her statement to be published in an enormous number of media outlets.

Date	Nature	Publishing Entity	Statement/URL
January 2, 2015	Internet	Ross Gow	Jane Doe 3 is Virginia Roberts - so not a new individual. The allegations made by Victoria Roberts against Ghislaine Maxwell are untrue. The original allegations are not new and have been fully responded to and shown to be untrue. Each time the story is re told it changes with new salacious details about public figures and world leaders and now it is alleged by Ms. Roberts that Alan Dershowitz is involved in having sexual relations with her, which he denies. Ms. Roberts's claims are obvious lies and should be treated as such and not publicized as news, as they are defamatory. Ghislaine Maxwell's original response to the lies and defamatory claims remains the same. Maxwell strongly denies allegations of an unsavoury nature, which have appeared in the British press and elsewhere and reserves her right to seek redress at the repetition of such old defamatory claims.
January 2, 2015	Internet	Bolton News	http://www.theboltonnews.co.uk/news/national/11700192 Palace denies Andrew sex case claim/
January 3, 2015	Internet	Telegraph	http://www.telegraph.co.uk/news/uknews/theroyalfamily/11323872/Prince-Andrew-denies-having-relations-with-sex-slave-girl.html
January 3, 2015	Internet	Daily Mail	http://www.dailymail.co.uk/news/article-2895366/Prince-Andrew-lobbied-government-easy-Jeffrey-Epstein-Palace-denies-claims-royal-tried-use-influence-help-billionaire-paedophile-2008-police-probe.html
January 3, 2015	Internet	Huffington Post	http://www.huffingtonpost.co.uk/2015/01/03/duke-of-york-sex-abuse-claims_n_6409508.html
January 4, 2015	Internet	Express	http://www.express.co.uk/news/world/550085/Ghislaine-Maxwell-Jeffrey-Epstein-not-madam-paedophile-Florida-court-case-Prince-Andrew
January 4, 2015	Internet	Jewish News Online	http://www.jewishnews.co.uk/dershowitz-nothing-prince-andrews-sex-scandal/
January 5, 2015	Internet/ Broadcast	NY Daily News	http://www.nydailynews.com/news/world/alleged-madame-accused-supplying-prince-andrew-article-1.2065505
January 5, 2015	Internet/ Broadcast	AOL UK	http://www.aol.co.uk/video/ghislaine-maxwell-declines-to-comment-on-prince-andrew-allegations-518587500/

Two newest articles

[1] https://www.thesun.co.uk/archives/news/6754/prince-andrews-pal-ghislaine-groped-teen-girls/

[2] http://www.mirror.co.uk/news/uk-news/prince-andrews-pal-ghislaine-maxwell-5081971

31. In none of the nine instances was there any publication of the entire Press Release.

Giuffre has noted extensive evidence of the mass distribution of Maxwell's defamatory statement to over 66 million viewers as stated by her expert witness James Jansen ("Jansen").

32. Maxwell and her agents exercised no control or authority over any media organization, including the media identified in Giuffre's response to Interrogatory No. 6, in connection with the media's publication of portions of the Press Release

Giuffre has disputed this statement and noted it is completely devoid of record evidence and that the record establishes that Maxwell hired Gow because his position allowed him to influence the press to publish her defamatory statement, Dep. Tr. at 13:9-16; 15:18-16:3; 109:12-22; 110:16-21; 111:3-7, and that Maxwell caused her statement to be published by numerous major news organizations with wide readership all over the globe.

33. Eight years after Epstein's guilty plea in Florida, Giuffre brought this action, repeating many of the allegations she made in her CVRA joinder motion.

Giuffre has noted that the defamation cause of action against Maxwell did not accrue until Maxwell defamed her in January of 2015.

34. The complaint alleged that the January 2015 statement "contained the following deliberate falsehoods":

(a) That Giuffre's sworn allegations "against Ghislaine Maxwell are untrue."

(b) That the allegations have been "shown to be untrue."

(c) That Giuffre's "claims are obvious lies."

35. Giuffre lived independently from her parents with her fiancé long before meeting Epstein or Maxwell. After leaving the Growing Together drug rehabilitation facility in 1999, Giuffre moved in with the family of a fellow patient. There she

met, and became engaged to, her friend's brother, James Michael Austrich ("Austrich"). She and Austrich thereafter rented an apartment in the Ft. Lauderdale area with another friend and both worked at various jobs in that area. Later, they stayed briefly with Giuffre's parents in the Palm Beach/Loxahatchee, Florida area before Austrich rented an apartment for the couple on Bent Oak Drive in Royal Palm Beach. Although Giuffre agreed to marry Austrich, she never had any intention of doing so.

Giuffre has denied that she voluntarily lived independently from her parents with her fiancé; she states that she was a troubled minor child who was not realistically engaged prior to meeting Maxwell and Epstein, as she was not of legal age to marry. She confirms she had no intention of marrying Austrich.

36. Giuffre re-enrolled in high school from June 21, 2000 until March 7, 2002. After finishing the 9th grade school year at Forest Hills High School on June 9, 1999, Giuffre re-enrolled at Wellington Adult High School on June 21, 2000, again on August 16, 2000 and on August 14, 2001. On September 20, 2001, Giuffre then enrolled at Royal Palm Beach High School. A few weeks later, on October 12, 2001, she matriculated at

Survivors Charter School. Survivor's Charter School was an alternative school designed to assist students who had been unsuccessful at more traditional schools. Giuffre remained enrolled at Survivor's Charter School until March 7, 2002. She was present 56 days and absent 13 days during her time there. Giuffre never received her high school diploma or GED. The school day at Survivor's Charter School lasted from morning until early afternoon.

Giuffre has denied the statement and has noted that Giuffre's school transcripts indicate "NO COURSES TAKEN" for the 1999-2000 and 2000-2001 school years and that her attempt to work and resume school at Survivor's Charter School as a 10th grader in the 2001-2002 school year was limited to a portion of the school year, spanning fewer than six months from October 2001 to March 7, 2002. She states that she attempted to get away from Epstein's abuse and that the records indicate that Giuffre's attendance was poor, with 69 days present and 32 days absent out of a required 180 day school year. She was not enrolled at the end of the school year. Her presence on flights with Epstein, verified by Epstein's pilot on flight logs, and an abundance of witness testimony corroborate her story that she was flying domestic and internationally with Epstein at least 32

times between December 11, 2000 to July 28, 2001 and June 21, 2002 to August 21, 2002.

37. During the year 2000, Giuffre worked numerous jobs. In 2000, while living with her fiancé, Giuffre held five different jobs: at Aviculture Breeding and Research Center, Southeast Employee Management Company, The Club at Mar-a-Lago, Oasis Outsourcing, and Neiman Marcus. Her taxable earnings that year totaled nearly $9,000. Giuffre cannot now recall either the Southeast Employee Management Company or the Oasis Outsourcing jobs.

Giuffre has disputed the statement and has noted that while she held various jobs in 2000, Social Security Administration records do not show the exact dates of employment (month and day) because they do not need this information to figure Social Security benefits. She states that neither Southeast Employee Management Company nor Oasis Outsourcing were her employers. She states that she worked at Taco Bell, as well as a pet store, but that neither of these are listed on her Social Security Administration records because they were most likely paid through payroll companies. She subsequently worked at Mar-a-Lago. She also volunteered at Aviculture Breeding and

Research Center, where they eventually put her on the payroll but paid her very little.

38. Giuffre's employment at The Mar-a-Lago spa began in fall 2000. Giuffre's father, Sky Roberts ("Roberts"), was hired as a maintenance worker at The Mar-a-Lago Club in Palm Beach, Florida, beginning on April 11, 2000. Roberts worked there year-round for approximately 3 years. After working there for a period of time, Roberts became acquainted with the head of the spa area and recommended Giuffre for a job there. Mar-a-Lago closes every Mother's Day and reopens on November 1. Most employees at Mar-a-Lago, including all employees of the spa area such as "spa attendants," are "seasonal" and work only when the club is open, *i.e.*, between November 1 and Mother's Day. Giuffre was hired as a "seasonal" spa attendant to work at the Mar-a-Lago Club in the fall of 2000 after she had turned 17.

Giuffre has disputed the statement and noted that the Mar-a-Lago Club produced 177 pages of records in response to Maxwell's subpoena which did not indicate Giuffre's actual dates of employment, nor whether she was a full-time or seasonal employee. The only significant record produced was a single,

vague chart entry indicating that Giuffre was terminated in 2000 and that Mar-a-Lago was a summer job.

39. Giuffre represented herself as a masseuse for Epstein. While working at the Mar-a-Lago spa and reading a library book about massage, Giuffre met Maxwell. Giuffre thereafter told her father that she got a job working for Epstein as a masseuse. Giuffre's father took her to Epstein's house on one occasion around that time, and Epstein came outside and introduced himself to Roberts. Giuffre commenced employment as a traveling masseuse for Epstein. Giuffre was excited about her job as a masseuse, about traveling with him and about meeting famous people. Giuffre represented that she was employed as a masseuse beginning in January 2001. Giuffre never mentioned Maxwell to Austrich. Giuffre's father never met Maxwell.

Giuffre has denied the statement and has noted that in Florida, a person cannot work as a masseuse unless she is "at least 18 years of age or has received a high school diploma or high school equivalency diploma," Fla. Stat. § 480.041. She was a minor child, under the age of 18, when she was working at Mar-a-Lago as a spa attendant and was approached by Maxwell who told her she could make money as a masseuse, a profession in which

Giuffre had no experience. She states that her father drove her to Epstein's house, the address of which was given to her by Maxwell, that she was led into the house and instructed by Maxwell on how to give a massage. She states that Epstein and Maxwell turned the massage into a sexual encounter, and offered her money and a better life to be compliant in the sexual demands of Maxwell and Epstein. She then began travelling with Maxwell and Epstein on private planes and servicing people sexually for money — working not as a legitimate masseuse, but in a position of sexual servitude. Giuffre further noted that Epstein's house manager, Alessi, described Maxwell's methodical routine of how she prepared a list of places ahead of time, then drove to each place for the purpose of recruiting girls to massage Epstein. Alessi stated that on multiple occasions he drove Maxwell to pre-planned places while she recruited girls for massage, and that he witnessed Giuffre at Epstein's house on the very same day that he witnessed Maxwell recruit Giuffre from Mar-a-Lago. Giuffre further noted Sjoberg's testimony that she was similarly recruited.

40. In spring 2001, while living with Austrich, Giuffre lied to and cheated on him with Figueroa, her high school boyfriend. Giuffre and Austrich thereafter broke up, and

Figueroa moved into the Bent Oak apartment with Giuffre. When Austrich returned to the Bent Oak apartment to check on his pets and retrieve his belongings, Figueroa punched Austrich in the face. Figueroa and Giuffre fled the scene before police arrived. Figueroa was then a convicted felon and a drug abuser on probation for possession of a controlled substance.

Giuffre has objected to the statement as irrelevant and unrelated to the allegations made in Giuffre's complaint against Maxwell and the alleged information should be excluded by multiple rules of evidence, and has been contested by Giuffre.

41. Giuffre freely and voluntarily contacted the police to come to her aid in 2001 and 2002 but never reported to them that she was Epstein's "sex slave." In August 2001 at age 17, while living in the same apartment, Giuffre and Figueroa hosted a party with a number of guests. During the party, according to Giuffre, someone entered Giuffre's room and stole $500 from her shirt pocket. Giuffre contacted the police. She met and spoke with police officers regarding the incident and filed a report. She did not disclose to the officer that she was a "sex slave." A second time, in June 2002, Giuffre contacted

the police to report that her former landlord had left her belongings by the roadside and had lit her mattress on fire. Again, Giuffre met and spoke with the law enforcement officers but did not complain that she was the victim of any sexual trafficking or abuse or that she was then being held as a "sex slave."

Giuffre has objected to the statement as misleading and irrelevant and further noted that she was fearful of Maxwell and Epstein, and, accordingly, she would not have reported her abusers and noted that she knew that Epstein had control over the Palm Beach Police.

42. From August 2001 until September 2002, Epstein and Maxwell were almost entirely absent from Florida on documented travel unaccompanied by Giuffre. Flight logs maintained by Dave Rodgers ("Rodgers"), Epstein's private pilot, evidence the substantial number of trips away from Florida that Epstein and Maxwell took, unaccompanied by Giuffre, between August 2001 and September 2002. Rodgers maintained a log of all flights on which Epstein and Maxwell traveled with him. Epstein additionally traveled with another pilot who did not keep such logs and he also occasionally traveled via commercial flights.

For substantially all of thirteen months of the twenty-two month period from November 2000 to September 2002, Epstein was traveling outside of Florida unaccompanied by Giuffre. During this same period of time, Giuffre was employed at various jobs, enrolled in school, and living with her boyfriend.

Giuffre has disputed this statement and noted the flight logs produced in this matter provide substantive evidence of Giuffre's travel while in the control of Maxwell and Epstein, but are incomplete as Giuffre also was flown by Maxwell on commercial flights. The flight logs and pilot testimony clearly prove that Giuffre was flying domestic and internationally with Epstein at least 32 times between December 11, 2000 to July 28, 2001 and June 21, 2002 to August 21, 2002. Maxwell has acknowledged the flight logs are incomplete and that there were several pilots and co-pilots that flew Epstein and Maxwell (*e.g.*, Rodgers, Lawrence "Larry" Visoski, Bill Hammond, Pete Rathgeb, Gary Roxburgh, and Bill Murphy) in multiple aircrafts and that only Rodgers produced flight records. Giuffre states that Maxwell has also acknowledged that many of the girls recruited by Maxwell routinely traveled on commercial flights for the purposes of providing massages to Epstein or guests at Epstein's New York, New Mexico, or U.S. Virgin Island homes.

Giuffre has further noted that her passport application, travel records, and witness testimony demonstrate flight logs are incomplete, that she also flew commercially while she worked for Maxwell and Epstein. Her passport application, for example, listed travel plans to London, and subsequent flight logs listed Giuffre traveling to London with Maxwell, Epstein, and others. Giuffre has cited the evidence she contends establish her travel with Epstein and Maxwell, including massage training in Thailand.

43. Giuffre and Figueroa shared a '93 white Pontiac in 2001 and 2002. Giuffre freely traveled around the Palm Beach area in that vehicle. In August 2002, Giuffre acquired a Dodge Dakota pickup truck from her father. Figueroa used that vehicle in a series of crimes before and after Giuffre left for Thailand.

Giuffre has denied the statement and has noted that she purchased a car from the $10,000 payment she received from Epstein after she was forced to have sex with Prince Andrew in London at Maxwell's home.

44. Giuffre held a number of jobs in 2001 and 2002. During 2001 and 2002, Giuffre was gainfully employed at several jobs. She worked as a waitress at Mannino's Restaurant, at TGIFriday's restaurant ("CCI of Royal Palm Inc."), and at Roadhouse Grill. She also was employed at Courtyard Animal Hospital ("Marc Pinkwasser DVM").

Giuffre has denied the statement and noted that in 2001 and 2002 she attempted to go back to school to earn her GED, and tried unsuccessfully to hold down waitressing jobs. She earned $212.00 as a waitress working "briefly" at Mannino's Restaurant and, in 2002, earned $403.64 working at the TGIFriday's restaurant ("CCI of Royal Palm Beach") for a "short time period." She earned about $1,247.90 at Roadhouse Grill until about March 2002, and at the Courtyard Animal Hospital ("Marc Pinkwasser DVM") she received payroll checks for weeks ending April 22, 2002 to June 4, 2002, earning a total of $1,561.75. Not long after she lost her job at the Courtyard Animal Hospital, she was traveling with Maxwell to the Bahamas, Santa Fe, New Mexico, and New York.

45. Giuffre traveled to Thailand in September 2002 to receive formal training as a masseuse. Figueroa drove her to the

airport. While there, she initially contacted Figueroa frequently, incurring a phone bill of $4,000. She then met Robert Giuffre while in Thailand and decided to marry him. She thereafter ceased all contact with Figueroa from October 2002 until two days before Figueroa's deposition in this matter in May 2016.

Giuffre admitted traveling to Thailand to receive massage training in September 2002 but noted that she was given an assignment from Maxwell and Epstein that she had to recruit another underage girl from Thailand, and bring that young girl back to Epstein. Giuffre stated that she was expected to return to Epstein and Maxwell upon completion of her massage training and assignment, and that instead she escaped to Australia where she remained in hiding from Maxwell and Epstein for several years.

46. Detective Joseph Recarey ("Recarey") investigated Epstein and failed to uncover any evidence that Maxwell was involved in sexual abuse of minors, sexual trafficking or production or possession of child pornography. Recarey served as the lead detective from the Palm Beach Police Department charged with investigating Epstein. That investigation commenced in

2005. Recarey worked only on the Epstein case for an entire year. He reviewed previous officers' reports and interviews, conducted numerous interviews of witnesses and alleged victims himself, reviewed surveillance footage of the Epstein home, participated in and had knowledge of the search warrant executed on the Epstein home, and testified regarding the case before the Florida state grand jury against Epstein.

Recarey's investigation revealed that not one of the alleged Epstein victims ever mentioned Maxwell's name and she was never considered a suspect by the Government. None of Epstein's alleged victims said they had seen Maxwell at Epstein's house, nor said they had been "recruited by her," nor paid any money by her, nor told what to wear or how to act by her. Indeed, none of Epstein's alleged victims ever reported to the Government they had met or spoken to Maxwell. Maxwell was not seen coming or going from the house during the law enforcement surveillance of Epstein's home. The arrest warrant did not mention Maxwell and her name was never mentioned before the grand jury. No property belonging to Maxwell, including "sex toys" or "child pornography," was seized from Epstein's home during execution of the search warrant. Recarey, when asked to describe "everything that you believe you know about Ghislaine

Maxwell's sexual trafficking conduct," replied, "I don't." He confirmed he has no knowledge about Maxwell sexually trafficking anybody. Recarey also has no knowledge of Giuffre's conduct that is subject of this lawsuit.

Giuffre has denied the statement and noted that Recarey wanted to speak to Maxwell, but she did not return his calls and he concluded that Maxwell's role was to procure girls for Epstein. Giuffre further noted that in the execution of the search warrant, stationary was found in the home bearing Maxwell's name, and notes were written by house staff to Maxwell and message pads uncovered in trash pulls revealing numerous calls left at the house for Maxwell, indicating she was staying in the house during the days when Epstein was engaging in illegal sex acts with minors. Giuffre further noted that a walk through video taken during the execution of the search warrant revealed photos of topless females at the home, including a photograph of Maxwell naked hanging in the home. Alfredo Rodriguez ("Rodriguez"), the house butler from 2004 through 2005, a time period that included daily sexual abuse of underage females, testified that Maxwell kept a list of the local girls who were giving massages at her desk, and that Maxwell kept nude photos of girls on her computer. Giuffre states that Recarey

testified that when the search warrant was executed, the house had been sanitized and the computers removed from the home.

Giuffre states that the co-conspirator who maintained direct contact with the many underage victims was Kellen, whose sole responsibility was to schedule underage girls to visit Epstein for sex and reported directly to Maxwell. Figueroa testified that Maxwell personally requested that he find and bring girls to Epstein for sex once Giuffre had escaped, and that when he brought the girls Maxwell interacted with them, that Maxwell was "the boss" and that she knew everything that was going on.

47. No nude photograph of Giuffre was displayed in Epstein's home. Epstein's housekeeper, Alessi, "never saw any photographs of Virginia Roberts [Giuffre] in Epstein's house." Recarey entered Epstein's home in 2002 to install security cameras to catch a thief and did not observe any "child pornography" within the home, including on Epstein's desk in his office.

Giuffre has denied this statement and noted that Maxwell had pornography on her computer, that there was a

collage of nude photos in Epstein's closet, that the collage was taken into evidence by Recarey, who testified to that fact in his deposition, that Rizzo, a visitor to the home on numerous occasions, was reprimanded by Maxwell for looking at the nude photos, and that the search warrant revealed photographs of nudity displayed, including a photograph of Maxwell herself in the nude. Sjorberg testified that Maxwell bought her a camera for the specific purpose of her taking nude photos of herself and Giuffre has testified that there was a nude photograph of her at the house.

48. Giuffre drafted a "journal" describing individuals to whom she claims she was sexually trafficked as well as her memories and thoughts about her experiences with Epstein. In 2013, she and her husband created a bonfire in her backyard in Florida and burned the journal together with other documents in her possession. Giuffre also kept a "dream journal" regarding her thoughts and memories that she possessed in January 2016. To date, Giuffre cannot locate the "dream journal."

49. Giuffre publicly peddled her story beginning in 2011. Giuffre granted journalist Churcher extensive interviews

that resulted in seven widely distributed articles from March 2011 through January 2015. Churcher regularly communicated with Giuffre and her "attorneys or other agents" from "early 2011" to "the present day." Giuffre received approximately $160,000 for her stories and pictures that were published by many news organizations.

Giuffre has denied this statement in part and admitted it in part, noting that in 2011, Giuffre was still in hiding from Epstein and Maxwell in Australia and not looking to sell anything or even speak with anyone about what had happened to her. Churcher located Giuffre and impressed the importance of Giuffre standing up to those who had harmed her and speaking with federal authorities. Giuffre did so in 2011, bringing the abuse of Maxwell and Epstein to public light to prevent their continued abuse of others. Giuffre agreed to be interviewed by Churcher and was compensated for sharing her story, which came at the heavy price of being publicly scrutinized.

50. Giuffre drafted a 144-page purportedly autobiographical book manuscript in 2011 which she actively sought to publish. In 2011, contemporaneous with her Churcher interviews, Giuffre drafted a book manuscript which purported to

document Giuffre's experiences as a teenager in Florida, including her interactions with Epstein and Maxwell. Giuffre communicated with literary agents, ghost writers, and potential independent publishers in an effort to get her book published. She generated marketing materials and circulated those along with book chapters to numerous individuals associated with publishing and the media.

Giuffre has denied the statement in part and admitted it in part, stating that she received a Victim Notification Letter from the United States Attorney's office for the Southern District of Florida regarding her sexual victimization by Epstein, that in 2011 she sought psychological counseling from a psychologist for the trauma she endured, and that also that year Churcher sought her out and interviewed her. Giuffre was interviewed by the FBI in 2011. Giuffre has noted that she began to draft a fictionalized account of what happened to her as an act of empowerment and a way of reframing and taking control over the narrative of her past abuse that haunts her and, while she explored trying to publish her story to empower other individuals who were subject to abuse, she ultimately decided not to publish it.

51. The CVRA joinder motion filed by Giuffre generated a media maelstrom and spawned highly publicized litigation between Giuffre's lawyers — Bradley Edwards ("Edwards") and Paul Cassell ("Cassell") — and Dershowitz. After Giuffre publicly accused Dershowitz of sexual misconduct, Dershowitz vigorously defended himself in the media. He called Giuffre a liar and accused her lawyers of unethical conduct. In response, Edwards and Cassell sued Dershowitz, who counterclaimed. This litigation, in turn, caused additional media attention by national and international media organization.

Giuffre has denied the statement as set forth in Statement 7.

52. Giuffre formed non-profit Victims Refuse Silence to attract publicity and speak out on a public controversy. In 2014, Giuffre, with the assistance of the same counsel, formed a non-profit organization, Victims Refuse Silence. According to Giuffre, the purpose of the organization is to promote Giuffre's professed cause against sex slavery. The stated goal of her organization is to help survivors surmount the shame, silence, and intimidation typically experienced by victims of sexual

abuse. Giuffre attempts to promote Victims Refuse Silence at every opportunity. For example, Giuffre participated in an interview in New York with ABC to promote the charity and to get her mission out to the public.

Giuffre has denied that she formed the non-profit Victims Refuse Silence to "speak out on a public controversy," and noted she sought to help survivors of sexual abuse and sexual trafficking and in order to provide assistance to victims, she attempted to talk about the non-profit's mission when she had the opportunity to do so.

III. The Applicable Standard

Summary judgment is appropriate only where "there is no genuine issue as to any material fact and . . . the moving party is entitled to a judgment as a matter of law." Fed. R. Civ. P. 56(c). "[T]he substantive law will identify which facts are material." *Anderson v. Liberty Lobby, Inc.*, 477 U.S. 242, 248 (1986).

A dispute is "genuine" if "the evidence is such that a reasonable jury could return a verdict for the nonmoving party."

Id. The relevant inquiry on application for summary judgment is "whether the evidence presents a sufficient disagreement to require submission to a jury or whether it is so one-sided that one party must prevail as a matter of law." *Id.* at 251-52. A court is not charged with weighing the evidence and determining its truth, but with determining whether there is a genuine issue for trial. *Westinghouse Elec. Corp. v. N.Y. City Transit Auth.*, 735 F. Supp. 1205, 1212 (S.D.N.Y. 1990) (quoting *Anderson*, 477 U.S. at 249). "[T]he mere existence of *some* alleged factual dispute between the parties will not defeat an otherwise properly supported motion for summary judgment; the requirement is that there be no genuine issue of material fact." *Anderson*, 477 U.S. at 247-48 (emphasis in original).

While the moving party bears the initial burden of showing that no genuine issue of material fact exists, *Atl. Mut. Ins. Co. v. CSX Lines, L.L.C.*, 432 F.3d 428, 433 (2d Cir. 2005), in cases where the non-moving party bears the burden of persuasion at trial, "the burden on the moving party may be discharged by 'showing'—that is, pointing out to the district court—that there is an absence of evidence to support the nonmoving party's case." *Celotex Corp. v. Catrett*, 477 U.S. 317, 325 (1986). "It is ordinarily sufficient for the movant to point

to a lack of evidence . . . on an essential element of the non-movant's claim . . . . [T]he nonmoving party must [then] come forward with admissible evidence sufficient to raise a genuine issue of fact for trial . . . ." *Jaramillo v. Weyerhaeuser Co.*, 536 F.3d 140, 145 (2d Cir. 2008) (internal citations omitted); *see also Goenaga v. March of Dimes Birth Defects Found.*, 51 F.3d 14, 18 (2d Cir. 1995) ("Once the moving party has made a properly supported showing sufficient to suggest the absence of any genuine issue as to a material fact, the nonmoving party ... must come forward with evidence that would be sufficient to support a jury verdict in his favor").

IV. The Motion for Summary Judgment on Republication Grounds is Denied

Maxwell has moved for summary judgment dismissing Giuffre's complaint on the grounds that Maxwell is not liable for the republication of her Press Release by the media. Because as a matter of law the issuer of a press release is responsible for its publication, the motion is denied.

In New York, liability for a republication "must be based on real authority to influence the final product." *Davis*

v. Costa-Gavras, 580 F. Supp. 1082, 1096 (S.D.N.Y. 1984); *see also Hoffman v. Landers*, 146 A.D.2d 744, 747 (N.Y. App. Div. 2d Dep't 1989) ("One who makes a defamatory statement is not responsible for its recommunication without his authority or request by another over whom he has no control."). Where a defendant "had no actual part in composing or publishing," he cannot be held liable "without disregarding the settled rule of law that no man is bound for the tortious act of another over whom he has not a master's power of control." *Davis*, 580 F. Supp. at 1096 (internal quotation marks and citation omitted). The New York Court of Appeals summarized New York's republication liability standard in *Geraci v. Probst*, 938 N.E.2d 917 (N.Y. 2010), stating that

> one who . . . prints and publishes a libel[] is not responsible for its voluntary and unjustifiable repetition, without his authority or request, by others over whom he has no control and who thereby make themselves liable to the person injured, and that such repetition cannot be considered in law a necessary, natural and probable consequence of the original slander or libel.

938 N.E.2d at 921 (internal quotation marks and citation omitted). Thus, "conclusive evidence of lack of actual authority [is] sufficiently dispositive that the [court] 'ha[s] no option but to dismiss the case . . . .'" *Davis*, 580 F. Supp. at 1096

(quoting *Rinaldi v. Viking Penguin, Inc.*, 420 N.E.2d 377, 382 (N.Y. 1981)).

However, New York law assigns liability to individuals for the media's publication of press releases. New York appellate courts have held that an individual is liable for the media publishing that individual's defamatory press release. *See Levy v. Smith*, 132 A.D.3d 961, 962-63 (N.Y. App. Div. 2d Dep't 2015) ("Generally, [o]ne who makes a defamatory statement is not responsible for its recommunication without his authority or request by another over whom he has no control . . . . Here, however, . . . the appellant intended and authorized the republication of the allegedly defamatory content of the press releases in the news articles."); *see also* RESTATEMENT (SECOND) OF TORTS § 576 (1977) ("The publication of a libel or slander is a legal cause of any special harm resulting from its repetition by a third person if . . . the repetition was authorized or intended by the original defamer, or . . . the repetition was reasonably to be expected.")

The facts as set forth above establish that Maxwell approved the Press Release. The Press Release was sent to between six and 30 media representatives by Gow as an employee

of Acuity Reputation, the public relations firm hired by Maxwell. The initial sentence of the Press Release – "Please find attached a quotable statement on behalf of Maxwell" – communicates Maxwell's authorization for the media recipients of the Press Release to publish it. *See Nat'l Puerto Rican Day Parade, Inc. v. Casa Pubs., Inc.*, 79 A.D.3d 592, 595 (N.Y. App. Div. 1st Dep't 2010) (affirming the refusal to dismiss defamation counts against a defendant who "submitted an open letter that was published in [a] newspaper, and that [the defendant] paid to have the open letter published," finding that the defendant "authorized [the newspaper] to recommunicate his statements.").

Maxwell has cited *Geraci v. Probst* in support of her position, but *Geraci* is distinguishable from the instant action. In *Geraci*, the defendant sent a letter to the Board of Fire Commissioners, and, more than three years later, a newspaper published the letter. The court held that the defendant was not liable for that belated publication, "made years later without his knowledge or participation." 938 N.E.2d at 919. Here, unlike in *Geraci*, the Press Release was not published "without [her] authority or request," but rather with Maxwell's authority and

by her express request. Gow's testimony establishes Maxwell's authority and control over the Press Release:

> Q. When you sent that email were you acting pursuant to Ms. Maxwell's retention of your services?
>
> A. Yes, I was
>
> ***
>
> Q. The subject line does have "FW" which to me indicates it's a forward. Do you know where the rest of this email chain is?
>
> A. My understanding of this is: It was a holiday in the UK, but Mr. Barden was not necessarily accessible at some point in time, so this had been sent to him originally by Ms. Maxwell, and because he was unavailable, she forwarded it to me for immediate action. I therefore respond, "Okay, Ghislaine, I'll go with this."
>
> It is my understanding that this is the agreed statement because the subject of the second one is "Urgent, this is the statement" so I take that as an instruction to send it out, as a positive command: "This is the statement."

Maxwell also cites *Davis v. Costa-Gavras*, involving a libel claim against an author who wrote a book about a military coup in Chile. 580 F. Supp. at 1085. Years after the author published the book, a third-party publishing house republished the book in paperback form and a third-party filmmaker released a movie based on the book. The book author did not actually participate in the republications, though he was aware of the

projects. The court held that the author of the book could not be held liable for the republications, explaining that a "party who is 'innocent of all complicity' in the publication of a libel cannot be held accountable." 580 F. Supp. at 1094 (internal citations omitted). The court further noted that "active participation in implementing the republication resurrects the liability." *Id.* Likewise, in *Karaduman v. Newsday, Inc.*, 416 N.E.2d 557 (1980), also cited by Maxwell, the court held that reporters of a series of articles on narcotics trade "cannot be held personally liable for injuries arising from [the] subsequent republication in book form absent a showing that they approved or participated in some other manner in the activities of the third-party republisher." *Id.* at 559-560. However, the court explicitly noted that this result was required because "the record [wa]s barren of any concrete evidence of the reporters' involvement in the republication of the newspaper series." *Id.* at 540.

Here, there is evidence in the record that Maxwell "actively participated" in influencing the media to publish the Press Release, *Davis*, 580 F. Supp. at 1094, and "approved" of and sought the publication of the press release, *Karaduman*, 416 N.E.2d at 560. Maxwell retained a public relations media

specialist. The Press Release was sent by Maxwell's express request. Gow's testimony about the process leading up to the dissemination of the Press Release indicates that Maxwell did, indeed, "authorize or intend" for the media recipients to publish the statement. Because there are sufficient facts to demonstrate Maxwell's authority and control over the publication of the Press Release, Maxwell's liability for the Press Release's publication survives the motion for summary judgment.

Maxwell has additionally asserted that subjecting her to liability for republication is "particularly unfair" because excerpts of the Press Release, rather than the whole statement, were published. Def.'s Reply at 9. Maxwell cites to *Rand v. New York Times Co.*, 75 A.D.2d 417 (N.Y. App. Div. 1st Dep't 1980), in which a newspaper paraphrased the defendant's opinion, essentially "excis[ing] the opinion from the context in which it was given." *Id.* at 424. No similar alteration, sanitization, hyperbolizing, or paraphrasing of Maxwell's statements has been established here. Nor does the record establish that any statements of Maxwell's were taken out of context; rather, they were directly quoted, accurately and unchanged. The publication of Maxwell's statement that Giuffre's claims are "obvious lies"

does not distort or misrepresent the message Maxwell intended to convey to the public with the Press Release.

Because the purpose of the issuance of the Press Release was publication, Maxwell is liable for its content and the motion for summary judgment on the grounds of non-liability for republication is denied.

V. The Motion for Summary Judgment to Dismiss the Defamation Claim on the Ground of Substantial Truth is Denied

Maxwell has asserted that the Press Release is substantially true and that the defamation claim should therefore be dismissed. *See* Def.'s Br. at 39. Whether or not Giuffre lied about Maxwell's involvement in the events that Giuffre has alleged took place is the intensely contested factual issue that is the foundation of this action. Accordingly, summary judgment is not appropriate. See *Mitre Sports Intern. Ltd. v. Home Box Office, Inc.*, 22 F. Supp. 3d 240, 255 (S.D.N.Y. 2014) (denying summary judgment because it would require the Court to decide disputed facts to determine whether the statement at issue was substantially true); *Da Silva v. Time Inc.*, 908 F. Supp. 184, 187 (S.D.N.Y. 1995) (denying motion for summary judgment because there was a genuine issue of

material fact as to whether defamatory photo and caption were true).

Under New York law, "truth is an absolute, unqualified defense to a civil defamation action" and "'substantial truth' suffices to defeat a charge of libel." Jewell v. NYP Holdings, Inc., 23 F. Supp. 2d 348, 366 (S.D.N.Y. 1998) (internal quotation marks and citations omitted). A statement is substantially true if the statement would not "have a different effect on the mind of the reader from that which the pleaded truth would have produced." *Id.* (quoting *Fleckenstein v. Friedman*, 193 N.E. 537, 538 (N.Y. 1934)). Thus, "it is not necessary to demonstrate complete accuracy to defeat a charge of libel. It is only necessary that the gist or substance of the challenged statements be true." *Printers II, Inc. v. Professionals Publishing, Inc.*, 784 F.2d 141, 146 (2d Cir. 1986); *see also Korkala v. W.W. Norton & Co.*, 618 F.Supp. 152, 155 (S.D.N.Y. 1985) ("Slight inaccuracies of expression are immaterial provided that the defamatory charge is true in substance.") (internal quotation marks and citation omitted); *Sharon v. Time, Inc.*, 609 F.Supp. 1291, 1294 (S.D.N.Y. 1984) ("Defendant is permitted to prove the substantial truth of this statement by establishing any other proposition that has the

same 'gist' or 'sting' as the original libel, that is, the same effect on the mind of the reader.").

The Honorable Loretta A. Preska has noted that cases addressing whether a statement is substantially true "fall along a broad spectrum." *Jewell*, 23 F. Supp. at 367. There are cases in which a statement is non-actionable because it is completely true. *See, e.g.*, *Carter*, 233 A.D.2d 473, 474 (N.Y. App. Div. 2d Dep't 1996) (claim that defendant committed libel by informing the authorities that plaintiff was endorsing checks made payable to the defendant and depositing them in plaintiff's account held non-actionable where plaintiff had in fact endorsed checks made payable to the defendant). There are cases where "one struggles to identify any area of ambiguity as to truth." *Jewell*, 23 F. Supp. at 368; *see, e.g.*, *Miller v. Journal-News*, 211 A.D.2d 626, 627 (N.Y. App. Div. 2d Dep't 1995) (statement that plaintiff was "suspended" substantially true where plaintiff was placed on "administrative leave"). There are cases where the line between the statement and the admitted truth is more tenuous, but the overall "gist" cannot be said to be substantially different. *See, e.g.*, *Guccione v. Hustler Magazine, Inc.*, 800 F.2d 298, 302-03 (2d Cir. 1986) (holding that statement which implied that plaintiff was then currently an adulterer was substantially true

where plaintiff had ceased being an adulterer but had "unabashedly committed adultery" for thirteen of seventeen years). Finally, there are "those cases in which a defendant simply asks too much in asserting that a statement is substantially true because the difference between the two is plainly substantial." *Jewell*, 23 F. Supp. at 368. For example, the court in *Da Silva*, 908 F. Supp. at 186-87, held that a photograph of plaintiff which identified her as a prostitute was not substantially true where the plaintiff had been a prostitute for some six years but was not at the time of publication.

After reviewing this spectrum of cases, the facts upon which Maxwell bases her argument are insufficient to allow this Court to find substantial truth as a matter of law. A material dispute of fact exists as to the "admitted truth" or the "reality" in this case. Maxwell has cited to various facts to counter Giuffre's claims, such as Giuffre's high school enrollment, short-term jobs, and lack of record on private flight logs during some of the relevant time period, as evidence that Maxwell and Epstein did not abuse Giuffre. The details and significance of the facts offered are highly contested, and therefore cannot establish the "substantial truth" of the Press Release. "[R]easonable jurors could conclude that the statements

. . . are not substantially true." *Boehner v. Heise*, 734 F. Supp. 2d 389, 399 (S.D.N.Y. 2010).

The motion for summary judgment to dismiss the defamation on the ground of substantial truth is denied as not having been established by undisputed material facts.

VI. The Defamation Claim is Not Barred by New York Law

Maxwell has moved to dismiss the complaint on the ground that the Press Release is opinion and protected by the pre-litigation privilege under New York law. Because New York law does not support Maxwell's position, the motion for summary judgment based on the characterization of the Press Release as opinion and as protected by a pre-litigation privilege is denied.

1. The Press Release is Not Opinion.

As previously held, Maxwell's statement that Giuffre's claims of sexual assault are lies is not an expression of opinion:

> First, statements that Giuffre's claims 'against [Maxwell] are untrue,' have been 'shown to be untrue,' and are 'obvious lies' have a specific and readily understood factual meaning: that Giuffre is not telling the truth about her history of sexual abuse and [Maxwell]'s role, and that some verifiable investigation has occurred and come to a definitive conclusion proving that fact. Second, these statements (as they themselves allege), are capable of being proven true or false, and therefore constitute actionable fact and not opinion. Third, in their full context, while [Maxwell]'s statements have the effect of generally denying Giuffre's story, they also clearly constitute fact to the reader.

Giuffre v. Maxwell, 165 F. Supp. 3d 147, 152 (S.D.N.Y. 2016).

This Court further concluded that

> [Giuffre] cannot be making claims shown to be untrue that are obvious lies without being a liar. Furthermore, to suggest an individual is not telling the truth about her history of having been sexually assaulted as a minor constitutes more than a general denial, it alleges something deeply disturbing about the character of an individual willing to be publicly dishonest about such a reprehensible crime. [Maxwell]'s statements clearly imply that the denials are based on facts separate and contradictory to those that [Giuffre] has alleged.

Id.

Maxwell argues that the "context" of the entire statement "tested against the understanding of the average reader" should be that of a press release as a whole being read only by journalists. Def.'s Br. at 22 (quoting *Aronson v. Wiersma*, 483 N.E.2d 1138, 1139 (1985)). However, the ultimate

audience for a press release is the public. The motion to dismiss opinion clearly addressed this issue:

> Sexual assault of a minor is a clear-cut issue; either transgression occurred or it did not. Either Maxwell was involved or she was not. The issue is not a matter of opinion, and there cannot be differing understandings of the same facts that justify diametrically opposed opinion as to whether Maxwell was involved in Giuffre's abuse as Giuffre has claimed. Either Giuffre is telling the truth about her story and Maxwell's involvement, or Maxwell is telling the truth and she was not involved in the trafficking and ultimate abuse of Giuffre.

Giuffre, 165 F. Supp. at 152.

Maxwell has urged that these conclusions at the motion to dismiss stage should be revisited and revised when considering the summary judgment motion since the standard for deciding a Rule 12(b)(6) motion is different from the standard for deciding a Rule 56 motion. In deciding a 12(b)(6) motion, the court must accept as true the factual allegations and draw all inferences in the plaintiff's favor; a plaintiff need only state a claim that is "plausible on its face." *Id.* at 149 (internal quotation marks and citation omitted). In contrast, for a Rule 56 motion, the plaintiff defending the motion may not "rest on [the] allegations" in her complaint. *Anderson*, 477 U.S. at 249.

In deciding its motion to dismiss opinion, the Court relied on *Davis v. Boeheim*, 22 N.E.3d 999 (2014), and held that the three allegedly defamatory statements in the Press Release have a specific and readily understood factual meaning, are capable of being proven true or false, and "clearly constitute fact to the reader." *Giuffre*, 165 F. Supp. at 152. The Court determined that "[t]he dispositive inquiry" for purposes of deciding whether an allegedly defamatory statement is fact or nonactionable opinion is whether "a reasonable reader could have concluded that the statements were conveying facts about the plaintiff." *Id.* at 151 (internal quotation marks and citation omitted). To answer that inquiry, three factors enumerated in *Davis* were applied. *See id.* These three factors are the same as the four factors in *Immuno AG v. Moor-Jankowski*, 567 N.E.2d 1270 (N.Y. 1991); the difference is that the *Davis* court collapsed the *Immuno AG's* third and fourth factors into one. *See Davis*, 22 N.E.3d at 1005. "[T]he critical aspect of the inquiry, as articulated in the third factor set forth above, is to view the statements in context." *Jewell*, 23 F. Supp. 2d at 377. This contextual analysis "proceeds on two levels, the 'broader social setting' of the statements, as well as their 'immediate context.'" *Id.* (citing *Immuno*, 567 N.E.2d at 1280).

Maxwell acknowledges that the Court properly applied *Davis* at the motion to dismiss stage, but argues that the third factor, especially, benefits from the evidence presented in the motion for summary judgment. *See* Def.'s Br. at 32. In other words, Maxwell argues that "the Court did not have the 'full context'" of the Press Release or the "broader social context and surrounding circumstances of the statement." *Id.* At the motion to dismiss stage, the text of the Press Release had not yet been produced, nor had there been production of emails or deposition testimony regarding the Press Release.

The developed record necessitates the same conclusion as at the motion to dismiss stage. The context and surrounding circumstances remain the same. The publication was intended by Maxwell to reach the average reader, not simply the reporters, Barden's intent, a factual issue in contest, notwithstanding. The issue of truth or falsity is a factual determination, not a matter of opinion. *See Giuffre*, 165 F. Supp. 3d at 152 ("[S]tatements that Giuffre's claims 'against [Maxwell] are untrue,' have been 'shown to be untrue,' and are 'obvious lies' have a specific and readily understood factual meaning.").

2. *The Pre-Litigation Privilege is Inapplicable.*

Maxwell has contended that the pre-litigation privilege as enunciated in *Front, Inc. v. Khalil*, 28 N.E.3d 15, 16 (N.Y. 2015), applies. *See* Def.'s Br. at 33.

"A privileged communication is one which, but for the occasion on which it is uttered, would be defamatory and actionable." *Park Knoll Assocs. v. Schmidt*, 451 N.E.2d 182, 184 (N.Y. 1983). "[I]t is well-settled that statements made in the course of litigation are entitled to absolute privilege." *Front*, 28 N.E.3d at 18. The privilege that protects statements made in the course of litigation "can extend to preliminary or investigative stages of the process, particularly where compelling public interests are at stake." *Rosenberg v. MetLife, Inc.*, 866 N.E.3d 439, 443 (N.Y. 2007). In *Front*, the New York Court of Appeals ruled that the privilege for "statements made by attorneys prior to the commencement of litigation" is qualified rather than absolute. *Id.* at 16. Specifically, the Court held that an attorney's statements made before litigation has commenced are privileged if (1) the attorney has "a good faith basis to anticipate litigation" and (2) the statements are "pertinent to that anticipated litigation." *Id.* at 20.

The anticipated litigation, according to the Press Release, was "redress at the repetition of such old defamatory claims." *See* Press Release. According to Barden, Maxwell's lawyer, he participated in the preparation of the Press Release, the purpose of the Press Release was to dissuade the media from publishing Giuffre's allegations, and the implication of the Press Release was that any redress sought by Maxwell would be against the media. Giuffre has disputed Barden's claim that the Press Release was his own statement.

Certain of the cases cited by Maxwell in support of the privilege can be distinguished, according to Giuffre, in that they involve communications to or from parties to the ultimate litigation. *See, e.g., Kirk v. Heppt*, 532 F. Supp. 2d 586, 593 (S.D.N.Y. 2008) (the communication at issue was made by an attorney's client to the attorney's malpractice carrier concerning the client's justiciable controversy against the attorney over which the clients actually sued); *Black v. Green Harbour Homeowners' Ass'n, Inc.*, 19 A.D.3d 962, 963 (N.Y. App. Div. 3d Dep't 2005) (privilege applied to a letter sent by a home owner's association board of directors to the association's members informing them of the status of litigation to which the

association was a party). Giuffre contends that "there was no statement made by anyone before the commencement of litigation because litigation never commenced." *See* Pl.'s Opp'n at 42.

Here, the communication at issue was sent to members of the media, and no litigation took place between Maxwell and the media recipients of the Press Release.

However, the pre-litigation privilege is not limited to statements between parties and their lawyers. "While the communications at issue in *Front* were among lawyers and potential parties, the New York Court of Appeals did not explicitly require the recipient of the challenged statements to be a lawyer or potential party." *Feist v. Paxfire, Inc.*, No. 11 CIV. 5436 (LGS), 2017 WL 177652, at *5 (S.D.N.Y. Jan. 17, 2017); *see Front*, 28 N.E.3d at 16-17. The Second Circuit "summarily rejected this interpretation when it applied *Front* to an attorney's communications to the press." *See Tacopina v. O'Keeffe*, 645 F. App'x 7, 8 (2d Cir. 2016) ("Even crediting [the plaintiff]'s allegation that [the attorney] shared the affidavit with the Daily News before filing it in court, Tacopina has still not sustained his burden of showing that the statements were not pertinent to a good faith anticipated litigation.").

Though a statement made to a non-party may be privileged, the pre-litigation privilege does not apply here because the Press Release cannot be considered a "statement[] made by [an] attorney." *Front*, 28 N.E.3d at 16. Whether Maxwell's attorney, Barden, had a hand in drafting the Press Release, and the extent to which he may have been involved, is a disputed issue of fact. The record evidence establishes that, regardless, the Press Release is properly attributable to Maxwell. Maxwell retained a public relations firm and sent her representative there, Gow, a forwarded email with the statements that were to be used in the Press Release. Maxwell instructed Gow to send it, as he testified in his deposition. While Maxwell herself did not disseminate the email to the media recipients, neither did Barden. The statement was sent out by Gow.

Additionally, the alleged defamatory statements in the Press Release were attributed to Maxwell, and not to her attorney or his agents. The email stated that the Press Release was a "statement on behalf of" Maxwell and notified the media recipients that "[n]o further communication will be provided by her [Maxwell] on this matter." There is no evidence in the email

that the Press Release was anything near an attorney's statement; Barden was not even copied on the email.

The pre-litigation privilege is intended to protect attorneys from defamations claims "so that those discharging a public function may speak freely to zealously represent their clients without fear of reprisal or financial hazard." *Id.* at 18. Where the statement cannot be attributed to an attorney, there is no justification for protecting it by privilege.

In addition, as this Court concluded in denying Maxwell's motion to dismiss, "[t]here is no qualified privilege under New York law when such statements are spoken with malice, knowledge of their falsity, or reckless disregard for their truth." *Giuffre*, 165 F. Supp. 3d at 155 (internal quotation marks and citation omitted). It is Giuffre's contention that Maxwell knew the statements were false because she engaged in and facilitated the sexual abuse of Giuffre. Therefore, according to Giuffre, they were not made in good faith anticipation of litigation, and instead were made for the inappropriate purpose of "bully[ing]," "harass]ment]," and "intimid[ation]." *See Front*, 28 N.E.3d at 19 (2015). According to Giuffre, there is ample record evidence that Maxwell acted

with malice in issuing the Press Release, thereby making the pre-litigation privilege inapplicable.

Because of the existence of triable issues of material fact rather than opinion and because the pre-litigation privilege is inapplicable, the motion for summary judgment is denied.

VII. Conclusion

For the reasons set forth above, the motion for summary judgment is denied.

The parties are directed to jointly file a proposed redacted version of this Opinion consistent with the Protective Order or notify the Court that none are necessary within one week of the date of receipt of this Opinion.

It is so ordered.

New York, NY
March 22, 2017

ROBERT W. SWEET
U.S.D.J.